



Annual Report

Number	Permit Section	Question
1	S5.A.2	<p>Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)</p> <p>Saved Document Name: 2018 Mount Vernon SWMP Final_1_03282018120313</p>
2	S9.D.5	<p>Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.5.</p> <p>Not Applicable</p>
3	S5.A.3	<p>Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.</p> <p>Yes</p>
4	S5.A.5.b	<p>Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)</p> <p>Yes</p>
5	S5.C.1.a.i and ii	<p>Attach description of public education and outreach efforts conducted per S5.C.1.a.i and ii.</p> <p>Saved Document Name: E&O Annual Report 2017_5_03282018120643</p>
6	S5.C.1.b	<p>Created stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.1.b.</p> <p>Yes</p>
7	S5.C.1.b	<p>Used results of measuring the understanding and adoption of targeted behaviors among at least one audience in at least one subject area to direct education and outreach resources and evaluate changes in adoption of targeted behaviors. (Required no later than February 2, 2016, S5.C.1.b)</p> <p>Not Applicable</p>
8	S5.C.2.a	<p>Describe the opportunities created for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP. (S5.C.2.a)</p> <p>SWMP was posted on City's website and was presented to City Council in a public meeting with comment opportunity. Notices were posted in newspaper, internet, and announcements were made during televised council meetings. Process includes posting SWMP on internet for public comment prior to presentation at Public Works committee meeting. Public will be informed via newspaper, internet, and public television. Committee meeting is open to public.</p>
9	S5.C.2.b	<p>Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.2.b)</p> <p>Yes</p>

Number	Permit Section	Question
9b	S5.C.2.b	List the website address. http://www.mountvernonwa.gov/index.aspx?NID=426
10	S5.C.3.a.i - vi	Maintained a map of the MS4 including the requirements listed in S5.C.3.a.i.-vi. Yes
11	S5.C.3.b.v	Implemented a compliance strategy, including informal compliance actions as well as enforcement provisions of the regulatory mechanism described in S5.C.3.b. (S5.C.3.b.v) Yes
12	S5.C.3.b.vi	Updated, if necessary, the regulatory mechanism to effectively prohibit illicit discharges into the MS4 per S5.C.3.b.vi. (Required no later than February 2, 2018) Not Applicable
13	S5.C.3.c.i	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.3.c.i. Yes
13b	S5.C.3.c.i	Cite methodology Conduct ongoing video surveys of buried pipes for condition assessment and detecting illicit connections. Have spill hotline and response program for responding to illicit discharges. Conduct annual field screening of MS4 outfalls for IDDE.
14	S5.C.3.c.i	Percentage of MS4 coverage area screened in reporting year per S5.C.3.c.i. (Required to screen 40% of MS4 no later than December 31, 2017 (except no later than June 30, 2018 for the City of Aberdeen) and 12% on average each year thereafter. (S5.C.3) 22
15	S5.C.3.c.ii	List the hotline telephone number for public reporting of spills and other illicit discharges. (S5.C.3.c.ii) 360-336-6204
15b	S5.C.3.c.ii	Number of hotline calls received. 17
16	S5.C.3.c.iii	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.3.c.iii. Yes
17	S5.C.3.c.iv	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. (S5.C.3.c.iv) Yes

Number	Permit Section	Question
17b	S5.C.3.c.iv	Describe the information sharing actions. (S5.C.3.c.iv) The City of Mount Vernon contracts with Skagit Conservation District to conduct public education and outreach activities. The City also works with Skagit Health District to talk with Mount Vernon business about stormwater pollution, and made 63 visits to businesses in 2017 to talk about sources of stormwater pollution, inspect sites, and send follow-up letters if needed.
18	S5.C.3.d	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.3.d. Yes
19	S5.C.3.d.iv	Number of illicit discharges, including illicit connections, eliminated during the reporting year. (S5.C.3.d.iv) 4
20	S5.C.3.d.iv	Attach a summary of actions taken to characterize, trace and eliminate each illicit discharge found by or reported to the permittee. For each illicit discharge, include a description of actions according to required timeline per S5.C.3.d.iv Saved Document Name: 2017 Illicit Discharges_20_03282018120940
21	S5.C.3.e	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.3.e. Yes
22	S5.C.4.a	Implemented an ordinance or other enforceable mechanism to address runoff from new development, redevelopment and construction sites per the requirements of S5.C.4.a. Yes
23b	S5.C.4.a.i-iii	Cite code reference for revised ordinance or other enforceable mechanism to address runoff from new development, redevelopment and construction sites. Ord. 3700
24	S5.C.4.a.i	Number of exceptions granted to the minimum requirements in Appendix 1. (S5.C.4.a.i., and Section 6 of Appendix 1) 0
25	S5.C.4.a.i	Number of variances granted to the minimum requirements in Appendix 1. (S5.C.4.a.i., and Section 6 of Appendix 1) 0
26	S5.C.4.b.i	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.4.a.i. (S5.C.4.b.i) Yes
26b	S5.C.4.b.i	Number of site plans reviewed during the reporting period. 25

Number	Permit Section	Question
27	S5.C.4.b.ii	Inspected, prior to clearing and construction, permitted development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Damage Potential, or alternatively, inspected all construction sites meeting the minimum thresholds adopted pursuant to S5.C.4.a.i. (S5.C.4.b.ii) Yes
27b	S5.C.4.b.ii	Number of construction sites inspected per S5.C.4.b.ii. 18
28	S5.C.4.b.iii	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. (S5.C.4.b.iii) Yes
28b	S5.C.4.b.iii	Number of construction sites inspected per S5.C.4.b.iii. 18
29	S5.C.4.b.ii, iii and	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.4.b.ii, iii and v) 2
30	S5.C.4.b.iv	Inspected all permitted development sites that meet the thresholds in S5.C.4.a.i upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.4.b.iv) Yes
31	S5.C.4.b.ii-iv	Achieved at least 80% of scheduled construction-related inspections. (S5.C.4.b.ii-iv) Yes
32	S5.C.4.b.iv	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects. (S5.C.4.b.iv) Yes
33	S5.C.4.c	Implemented provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S5.C.4. a and b. (S5.C.4.c) Yes
35	S5.C.4.c.iii	Annually inspected stormwater treatment and flow control BMPs/facilities per S5.C.4.c.iii. Yes
35b	S5.C.4.c.iii	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.4.c.iii Not Applicable

Number	Permit Section	Question
36	S5.C.4.c.iv	Inspected new residential stormwater treatment and flow control BMPs/facilities and catch basins every 6 months per S5.C.4.c.iv to identify maintenance needs and enforce compliance with maintenance standards. Yes
37	S5.C.4.c.v	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.4.c.v) Yes
38	S4.C.4.c.vi	Verified that maintenance was performed per the schedule in S5.C.4.c.vi when an inspection identified an exceedance of the maintenance standard. Yes
38b	S5.C.4.c.vi	Attach documentation of any maintenance delays. (S5.C.4.c.vi) Not Applicable
39	S5.C.4.d	Provided copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity to representatives of proposed new development and redevelopment. (S5.C.4.d) Yes
40	S5.C.4.e	All staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities. (S5.C.4.e) Yes
42	S5.C.4.g	Participated and cooperated with the watershed-scale stormwater planning process led by a Phase I county. (S5.C.4.g) Not Applicable
43	S5.C.5.a	Updated and implemented maintenance standards as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the Stormwater Management Manual for Western Washington (as amended 2014). (Required no later than December 31, 2016, except no later than June 30, 2017 for Permittees in Lewis and Cowlitz counties, and no later than June 30, 2018 for the City of Aberdeen, S5.C.5.a). Yes
44	S5.C.5.a	Applied a maintenance standard that is not specified in the Stormwater Management Manual for Western Washington. No
45	S5.C.5.a.ii	Performed timely maintenance per S5.C.5.a.ii. Yes
46	S5.C.5.b	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.5.b) Yes

Number	Permit Section	Question
46b	S5.C.5.b	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.5.b) 199
46c	S5.C.5.b	Number of facilities inspected during the reporting period. (S5.C.5.b) 406
46d	S5.C.5.b	Number of facilities for which maintenance was performed during the reporting period. (S5.C.5.b) 249
47	S5.C.5.b	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.5.b. Not Applicable
48	S5.C.5.c	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.5.c. Yes
49	S5.C.5.d	Inspected all municipally owned or operated catch basins and inlets as per S5.C.5.d, or used an alternative approach. (Required once no later than August 1, 2017 and every two years thereafter, except once no later than June 30, 2018 and every two years thereafter for the City of Aberdeen) Yes
49b	S5.C.5.d	Number of known catch basins. 6192
49c	S5.C.5.d	Number of catch basins inspected during the reporting period. 3168
49d	S5.C.5.d	Number of catch basins cleaned during the reporting period. 1372
50	S5.C.5.d.i-ii	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.5.d.i or ii) Not Applicable
51	S5.C.5.f	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.5.f) Yes
52	S5.C.5.g	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.5.g.) Yes

Number	Permit Section	Question
53	S5.C.5.h	Implemented a Stormwater Pollution Prevention Plan for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.5.h) Yes
54	S7.A	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A) Not Applicable
55	S7.A	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A) Not Applicable
56	S8.A	Attach a description of any stormwater monitoring or stormwater-related studies as described in S8.A. Not Applicable
57	S8.B.1	Participated in cost-sharing for the regional stormwater monitoring program (RSMP) for status and trends monitoring. (S8.B.1) Yes
58	S8.C.1	Participated in cost-sharing for the regional stormwater monitoring program (RSMP) for effectiveness studies. (S8.C.1) (Required to begin no later than August 15, 2014) Yes
59	S8.D.1	Contributed to the RSMP for source identification and diagnostic monitoring information repository in accordance with S8.D.1. (Required to begin no later than August 15, 2014) Yes
60	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3) Yes
61	G3	Number of G3 notifications provided to Ecology. 3
62	G3.A	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A. Yes
63	S4.F.1	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1) Not Applicable

Number	Permit Section	Question
64	S4.F.3.a	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a. Not Applicable
65	S4.F.3.d	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d) Not Applicable
66	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20) Not Applicable
67	G20	Number of non-compliance notifications (G20) provided in reporting year. 0
67b	G20	List the permit conditions described in non-compliance notification(s). Not Applicable

Attachments:

View Files Attached to Submission

	DocDescr	DocName	DocExt	DocID	SubID	AppName
View	WAR045553_20_03282018120940	2017 Illicit Discharges_20_03282018120940	.pdf	670323	1618634	wqwebportal
View	WAR045553_1_03282018120313	2018 Mount Vernon SWMP Final_1_03282018120313	.pdf	670321	1618634	wqwebportal
View	WAR045553_5_03282018120643	E&O Annual Report 2017_5_03282018120643	.pdf	670322	1618634	wqwebportal

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City of Mount Vernon

2018 Stormwater Management Program



March 2018



City of Mount Vernon 2018 Stormwater Management Program

Prepared for
City of Mount Vernon, Washington
March 2018

City of Mount Vernon 2018 Stormwater Management Program

Prepared for
City of Mount Vernon, Washington
March 2018



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List of Abbreviations

2012 Ecology Manual	Stormwater Management Manual for Western Washington (2012)	SWMP Plan	written documentation of the SWMP
BMP	best management practice	SWPPP	stormwater pollution prevention plan
CAO	City Attorney's Office	TMDL	total maximum daily load
DS	Development Services (Department)	WLA	waste load allocation
City	City of Mount Vernon	WWCPA	Washington Wastewater Collection Personnel Association
CSO	combined sewer overflow		
CWA	Clean Water Act		
E&O	education and outreach		
Ecology	Washington State Department of Ecology		
EPA	U.S. Environmental Protection Agency		
IDDE	illicit discharge detection and elimination		
IPM	Integrated Pest Management Plan		
IS	Information Services		
LA	load allocation		
LID	low-impact development		
MEP	maximum extent practicable		
MS4	municipal separate storm sewer system		
NOI	Notice of Intent		
NPDES	National Pollutant Discharge Elimination System		
O&M	operation and maintenance		
PCHB	Pollution Control Hearings Board		
Phase II Permit	Western Washington Phase II Municipal Stormwater Permit		
PSSH	Puget Sound Starts Here		
QAPP	Quality Assurance Project Plan		
Road Map	Roads Operations and Maintenance Regional Coordination Program		
RSMP	Regional Stormwater Monitoring Program		
SCD	Skagit Conservation District		
SIDIR	Source Identification Information Repository		
SOG	Stormwater Outreach Group		
SOP	standard operating procedure		
STORM	Stormwater Outreach for Regional Municipalities		
SWMP	Stormwater Management Program		

Section 1

Introduction

This document presents the City of Mount Vernon's Stormwater Management Program (SWMP). Preparation and maintenance of this SWMP Plan is required by the Washington State Department of Ecology (Ecology) as a condition of the Western Washington Phase II Municipal Stormwater Permit (Phase II Permit). The Phase II Permit covers discharges from regulated small municipal separate storm sewer systems (MS4s). Based on criteria outlined in the Phase II Permit, Ecology considers the City of Mount Vernon (City) to be an operator of a small MS4, and the City is therefore required to comply with the Permit.

The Phase II Permit is a requirement of the federal Clean Water Act (CWA), which is intended to protect water quality and restore waters for "fishable, swimmable" uses. The federal Environmental Protection Agency (EPA) has delegated permit authority to Ecology and the Permit has the force of both state and federal law.

Each municipality's permit for discharging stormwater is designed to reduce the discharge of pollutants, protect water quality, and meet the requirements of the CWA. Phase II Permit requirements include making programmatic updates over time and this SWMP Plan has been revised accordingly.

Appendix A includes abbreviations and definitions from the Permit to help the reader understand the City's SWMP.

1.1 The Stormwater Problem

Stormwater is an identified problem for receiving water quality. The following section from the Ecology's Fact Sheet for the Phase II Permit describes some of the relevant issues.

Stormwater runoff is the leading pollution threat to lakes, rivers, streams, and marine water bodies in urbanized areas of Washington State. The large impervious surfaces in urban areas increase the quantity and peak flows of runoff, which in turn cause hydrologic impacts such as scoured streambed channels, in-stream sedimentation, and loss of habitat. Impacts from stormwater are highly site-specific and vary geographically due to differences in local land use conditions, hydrologic conditions, and the type of receiving water.

The following is a list of typical impacts caused by stormwater discharges:

- **Human health:** In general, untreated stormwater is unsafe. It contains toxic metals, organic compounds, and bacteria. Untreated stormwater is not safe for people to drink, and is not recommended for swimming.
- **Drinking water:** In some areas of Washington, notably Spokane County and parts of Pierce and Clark counties, gravelly soils allow rapid infiltration of stormwater. Untreated stormwater discharging to the ground could contaminate aquifers that are used for drinking water.
- **Salmon habitat:** Urban stormwater degrades salmon habitat in streams through effects on hydrologic flows and toxicity. Paved surfaces cause greater winter stormwater flows that erode stream channels, destroying spawning beds. Also, because stormwater does not infiltrate during the wet season, streams can lose summertime base flows, drying out habitat needed for salmon rearing. Toxic chemicals in stormwater harm the immature fish and the adults returning to spawn. The following two studies have identified concerns:

- Ecology and Pierce County recently conducted in situ trout toxicity testing studies. Pierce County found no significant toxicity in four urban streams in 2008.¹ However, Ecology identified the following chemical stressors that were capable of causing adverse effects that were detected on the native trout embryos and pre-swim-up fry: copper, lead, nickel, zinc, polycyclic aromatic hydrocarbons, and the agricultural fungicide Captan.²
- During the past decade, surveys of spawning adult Coho salmon in Seattle found that very high percentages of adult females (up to 90 percent) were dying before they could spawn. Although the precise causes of these acute die-offs are not yet known, stormwater pollution is likely involved. The problem appears to be widespread throughout urban streams in Puget Sound and is under active scientific investigation.^{3, 4, 5}
- **Shellfish industry:** Washington State’s multimillion-dollar shellfish industry is increasingly threatened by closures due to stormwater contamination.
- **Degraded water bodies:** In urban and urbanizing areas across Washington State, residential, commercial, and industrial land development has changed land cover and drastically altered stream channels. The impacts of urban land development have severely degraded, and will in many cases permanently destroy, fish resources and other beneficial uses of Washington’s waters.

—Ecology, “Fact Sheet for the Western Washington Phase II Municipal Stormwater Permit,” 2011

The City manages a number of complex systems potentially affecting stormwater. The City is involved in efforts that go beyond the scope of many larger municipalities including, but not limited to, river flood control operations, managing the City storm drain system, and operating sewage treatment facilities. While the City has long had a commitment to clean water and, as a result, is currently in compliance with state and federal requirements, it must now look toward meeting the demands of the new Phase II Permit, described in detail in Section 1.2 below.

1.2 Regulatory Background

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect and restore waters for “fishable, swimmable” uses. The EPA has delegated permit authority to state environmental agencies, and these agencies can set permit conditions in accordance with and in addition to the minimum federal requirements. In Washington, Ecology is the NPDES-delegated permit authority.

Municipalities with populations of more than 100,000 (as of the 1990 census) have been designated as Phase I communities and must comply with Ecology’s Phase I NPDES Municipal Stormwater Permit. With

¹ Nautilus Environmental, 2009. Pierce County Public Works and Utilities: Countywide Water Quality Monitoring Plan. *Pilot Test: Rainbow Trout Early Life Stages In-situ Bioassay*, Final Report submitted to Brown and Caldwell.

² Randall Marshall and Brandee Era-Miller. 2012. *Integrated Ambient Monitoring Pilot Report, Potential Causes for the Impairment of Rainbow Trout Early Lifestages Exposed in Indian Creek for 34 Days and Loss of Diversity in the Instream Benthic Communities*, Washington State Department of Ecology.

³ McCarthy, Sarah G, John P. Incardona, and Nathaniel L. Scholz. 2008, *Coastal Storms, Toxic Runoff, and the Sustainable Conservation of Fish and Fisheries*, American Fisheries Society Symposium 64:000-000.

⁴ Spromberg, Julann A., Baldwin, David H., Damm, Steven E., McIntyre, Jenifer K., Huff, Michael, Sloan, Catherine A., Anulacion, Bernadita F., Davis, Jay W., and Nathaniel L. Scholz. 2016, *Coho salmon spawner mortality in western US urban watersheds: bioinfiltration prevents lethal storm water impacts*, Journal of Applied Ecology, 2016, 53:398-407.

⁵ Feist, Blake E., Buhle, Eric R., Baldwin, David H, Spromberg, Julann A., Damm, Steven E., Davis Jay W., and Nathaniel L. Scholz. 2017, *Roads to ruin: conservation threats to a sentinel species across an urban gradient*, Ecological Applications, 2017, 27(8): 2382-2396.

Mount Vernon's population below the 100,000 threshold, the City must comply with the Phase II Municipal Stormwater Permit. About 100 other municipalities in Washington must also now comply with the Phase II Permit. Ecology's Phase II Permit is available on Ecology's Web site at <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits>.

The Permit allows municipalities to discharge stormwater runoff from municipal drainage systems into the state's water bodies (i.e., streams, rivers, lakes, and wetlands) as long as municipalities implement programs to protect water quality by reducing the discharge of "nonpoint source" pollutants to the "maximum extent practicable" (MEP) through application of Permit-specified "best management practices" (BMPs). The BMPs specified in the Permit are collectively referred to as the Stormwater Management Program (SWMP) and grouped under the following SWMP components:

- Public Education and Outreach (E&O)
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination (IDDE)
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Municipal Operation and Maintenance (O&M)
- Compliance with Total Maximum Daily Load Requirements
- Monitoring and Assessment

The original Phase II Permit issued by Ecology became effective on February 16, 2007, with an expiration date of February 15, 2012. On June 17, 2009, Ecology released a modified version of the 2007 Permit, which changed some of the requirement deadlines. In 2011 the Washington State Legislature passed and the governor signed ESHB 1478, authorizing Ecology to issue a new Permit, unchanged from the existing permit with effective dates from August 2012 to August 2013. Despite a gap between the Permit effective dates, the Permittees were required to continue to meet all requirements of the 2007 Permit through August 2013. An updated Permit was issued in August 2012 effective from August 2013 to August 2018; it was subsequently modified in January 2015 to reflect the outcomes of appeals made to the Pollution Control Hearings Board (PCHB). The Permit was originally set to expire on July 31, 2018, but Ecology administratively extended the Permit for one year, planning to reissue the Permit on July 1, 2019 with an effective date of August 1, 2019. The 2018 SWMP incorporates requirements under the 2013-2018 Permit.

A summary schedule of requirements and deadlines contained in the 2013–18 Permit was developed by the Cities of Covington and SeaTac for use by other cities and is included as a reference in Appendix B to this SWMP Plan. The Permit requires the City to report annually (March 31 of each year) on progress in SWMP implementation for the prior year. The Permit also requires submittal of documentation that describes proposed SWMP activities for the coming year. Implementation of various Permit conditions is phased in over the 5-year Permit cycle.

Ecology has published an updated 2012 Stormwater Management Manual for Western Washington (2012 Ecology Manual) to correspond with new requirements in the Permit. The Ecology Manual was further updated in 2014. In December 2016, the City adopted the 2012 Ecology Manual, which will remain in effect until the City elects or is required to adopt an updated manual.

1.3 City of Mount Vernon Regulated Area

The Phase II Permit applies to operators of regulated small MS4s that discharge stormwater to waters of Washington State located west of the crest of the Cascade Range (west of the eastern boundaries of Whatcom, Skagit, Snohomish, King, Pierce, Lewis, and Skamania Counties). For cities, the Permit requirements extend only to those areas of each city that drain to MS4s. In Mount Vernon, much of the downtown area drains to a combined sewer overflow (CSO) system, which sends runoff to the wastewater

treatment plant before entering the Skagit River. The CSO discharge area is covered under a permit separate from the Phase II Permit.

1.4 Total Maximum Daily Load Compliance

For stormwater discharges covered under this Permit, Permittees are required to implement actions necessary to achieve the pollutant reductions called for in applicable total maximum daily loads (TMDLs). A TMDL is based on calculations of the maximum amount of a pollutant a water body can receive and still meet water quality standards. Applicable TMDLs are those that have been approved by the EPA before the issuance date of the Permit or have been approved by the EPA prior to the date the Permittee's application is received by Ecology. Information on Ecology's TMDL program is available on Ecology's Web site at <https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Total-Maximum-Daily-Load-process>.

Ecology reviewed all TMDLs approved by EPA prior to Permit issuance, to determine whether municipal stormwater sources were identified in the TMDL. When most of these TMDLs were developed, municipal stormwater was considered a subset of nonpoint discharges, rather than a permitted discharge. As a result, very few TMDLs statewide contain requirements for municipal stormwater sources. Few TMDLs completed to date have established load allocations (LAs) or waste load allocations (WLAs) for municipal stormwater discharges covered under this Permit.

Appendix 2 of the Permit lists the cities and counties affected by TMDLs that were approved by EPA prior to Permit issuance. While the City of Mount Vernon has not been listed in Appendix 2, there are water quality impairments (CWA section 303[d] "listings") within the City that could potentially trigger TMDLs within a future Permit cycle.

The Lower Skagit River Fecal Coliform TMDL (Ecology 2007) is not listed in Appendix 2, but does have requirements for the City of Mount Vernon. The TMDL does not add any special requirements to the City's Permit, but states that compliances with the Permit constitutes compliance with the TMDL. Implementation of the SWMP assures City to be in full compliance with its obligation under the TMDL.

1.5 SWMP Implementation Responsibilities

The Public Works Department will be coordinating the overall administration of efforts to comply with Permit requirements. The Community and Economic Development (DS) Department will play a large role in the implementation of Permit program activities such as inspections, Permit review, code revisions, etc. The City has contracted with the Skagit Conservation District (SCD) to implement the Public Education and Outreach requirements of the Permit. The Skagit County Public Health Department conducts septic system inspections and a local source control program that help to educate citizens and businesses about stormwater pollution. Table 1-1 summarizes participant responsibilities for ensuring future Permit compliance. Sections 2 through 8 highlight the planned efforts of these departments and entities in more detail.

Table 1-1. SWMP Implementation Responsibilities		
Program component	City departments	Outside entities ^a
Stormwater Management Program	<ul style="list-style-type: none"> Public Works Finance Information Services (IS) City Attorney's Office (CAO) Human Resources (HR) 	

Table 1-1. SWMP Implementation Responsibilities		
Program component	City departments	Outside entities ^a
Public education and outreach	<ul style="list-style-type: none"> Public Works IS 	SCD Skagit County Public Health Department
Public involvement	<ul style="list-style-type: none"> Public Works IS 	SCD
Illicit discharge detection and elimination	<ul style="list-style-type: none"> Public Works DS Fire Department IS Police Parks & Recreation 	
Runoff controls	<ul style="list-style-type: none"> Public Works DS CAO 	
Pollution prevention and municipal operation and maintenance	<ul style="list-style-type: none"> Public Works DS CAO Parks and Recreation Facilities 	
Water quality monitoring	<ul style="list-style-type: none"> Public Works DS 	SCD

^a The Stormwater Outreach for Regional Municipalities (STORM) and Stormwater Work Group are outside entities that the City participates in and are resources for compliance assistance.

1.6 Document Organization

The contents of this document are based upon Permit requirements and Ecology’s “Guidance for City and County Annual Reports for Western Washington, Phase II Municipal Stormwater Permits.” The organization of the remainder of this SWMP Plan is modeled after that of the Permit:

- **Section 2** addresses Permit requirements for administering the City’s SWMP for 2018.
- **Section 3** addresses Permit requirements for public E&O for 2018.
- **Section 4** addresses Permit requirements for public involvement and participation for 2018.
- **Section 5** addresses Permit requirements for IDDE for 2018.
- **Section 6** addresses Permit requirements for controlling runoff from new development, redevelopment, and construction sites for 2018.
- **Section 7** addresses Permit requirements for municipal O&M for 2018.
- **Section 8** addresses Permit requirements for water quality monitoring and assessment for 2018.
- **Section 9** summarizes the City’s compliance activities.
- **Appendix A** provides abbreviations and definitions from the Permit.
- **Appendix B** provides a preliminary 2013–18 Western Washington Phase II Municipal Stormwater Permit Implementation Schedule (courtesy of cities of Covington and SeaTac)
- **Appendix C** provides the current City stormwater system map.

Each section includes a summary of the relevant Permit requirements and a description of current and planned compliance activities.

Section 2

Stormwater Management Program Administration

This section of the SWMP Plan provides a description of Permit requirements related to overall SWMP administration, including descriptions of the City's current and planned compliance activities for 2018.

2.1 Permit Requirements

The Permit (Section S5.A) requires the City to perform the following tasks over the course of the Permit cycle:

- Implement a SWMP and prepare written documentation (SWMP Plan) for submittal to Ecology on March 31 of each year, including annual updates to the SWMP. The purpose of the SWMP is to reduce pollutant discharge from the municipal stormwater system to the maximum extent practicable and thereby protect water quality.
- Submit the SWMP Plan for the new calendar year with annual compliance reports for the previous calendar year to Ecology by March 31, summarizing implementation status and providing information from assessment and evaluation procedures collected during the reporting period. Annual compliance reporting commenced in March 2015 (for the 2014 reporting year). The SWMP Plan for 2018 will be submitted to Ecology by March 31, 2018.
- Coordinate with other Permittees on stormwater-related policies, programs, and projects within adjacent or shared areas, and internal coordination among departments of each jurisdiction.

2.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the Permit include the following:

- The City has defined roles and responsibilities and developed standard operating procedures (SOPs) for completing updates to future SWMP documents and the Annual Compliance Report annually.
- The City maintains a cost accounting database for tracking annual Permit costs.
- The City maintains a training database for tracking and documenting compliance with all NPDES-related training.
- The City continues to coordinate with external entities such as the SCD, Sedro-Woolley, Burlington, Anacortes, and Skagit County.
- The City meets quarterly with The North Sound NPDES Municipal Stormwater Permit Phase I/II Forum to discuss stormwater policies and projects in the area.
- The City participates in the regional forums under Stormwater Outreach for Regional Municipalities (STORM), NPDES Permit coordinators, and Operations and Maintenance Regional Coordination Program (Road Map).

2.3 Planned 2018 Compliance Activities

The City has positioned itself well to maintain compliance as Ecology phases in the future Permit requirements. Actions recommended for continued compliance are included in Table 2-1, which presents the work plan for the 2018 SWMP administration activities.

Table 2-1. 2018 Stormwater Management Program Administration Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
SWMP-1	Continue development of existing NPDES SWMP cost accounting strategy and tracking system. Train staff on new system.	Public Works, Finance		City maintains cost-tracking database.
SWMP-2	Continue use and updates for NPDES training management structure and tracking system.	Public Works, IS, HR	All	City maintains NPDES training database.
SWMP-3	Maintain system for managing SOPs that are used among multiple departments.	Public Works, Finance	CAO	Ongoing.
SWMP-4	Summarize annual activities for "Stormwater Management Program" component of Annual Report; identify any updates to SWMP document.	Public Works, Finance	All	The SWMP and Annual Compliance Report submittal for the previous year is due on or before March 31 of each year.
SWMP-5	Coordinate with other Permittees on stormwater-related policies, programs, and projects within adjacent or shared areas.	Public Works	All	Local jurisdictions meet quarterly to discuss stormwater-related policies and programs. Continue to follow STORM, APWA NPDES Permit coordinators, and Road Map forums. Monitor the State Stormwater Work Group.

Section 3

Public Education and Outreach

This section provides a description of the Permit requirements related to public education and outreach (E&O), including descriptions of the City's current and planned compliance activities for 2018.

3.1 Permit Requirements

The Permit (Section S5.C.1) requires the City to perform the following tasks over the course of the Permit cycle:

- Implement an E&O program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. The program shall be designed to educate target audiences (e.g., the general public, businesses, homeowners, students, developers, City employees, etc.) about the stormwater problem and actions they can take to minimize the problem.
- Create stewardship opportunities to encourage participation in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.
- Measure the understanding and adoption of the targeted behaviors for at least one targeted audience in at least one subject area. Use the resulting measurements to direct E&O resources no later than February 2, 2016. This requirement can be met individually or as a member of a regional group.
- Track and maintain records of public E&O activities.

3.2 Current Compliance Activities

The City currently contracts with the SCD to conduct numerous E&O activities that address stormwater management. Skagit County also assists the City with stormwater education and outreach through its "On Site Sewage Program" that informs citizens and businesses on septic system operation and maintenance. Skagit County and SCD's current activities and programs address the Permit requirements. These programs address the general public, residents/homeowners, developers, City staff, contractors, businesses, engineers, and schoolchildren. The City has also been using the City cable TV channel to broadcast information about stormwater.

SCD tracks all of its E&O efforts and attendees to workshops in Excel databases and Word documents. Skagit County also documents all inspections and businesses visited in spreadsheets. These documents are submitted to the City annually.

The City Information Services Department tracks the number of times videos and commercials are played relating to stormwater.

The City is participating in the STORM group to help identify appropriate program evaluation techniques to measure improvements in stormwater quality from E&O efforts.

3.3 Planned 2018 Compliance Activities

The City has an existing stormwater public E&O program that meets the requirements of the Permit. The City will continue to partner with SCD in 2018 to carry on similar activities as those listed in Section 3.2. Actions recommended for continued compliance are included in Table 3-1, which presents the work plan for the 2018 public education and outreach activities.

Table 3-1. 2018 Public Education and Outreach Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
EDUC-1	Coordinate with SCD, APWA, STORM, and other regional efforts to implement the E&O Plan.	Public Works	SCD	Ongoing.
EDUC-2	Continue collaboration with other NPDES municipalities and the STORM group to identify appropriate program evaluation techniques.	Public Works	SCD and STORM	Ongoing.
EDUC-3	Continue to implement E&O strategy with SCD to supplement existing activities.	Public Works	SCD IS	Ongoing.
EDUC-4	Continue developing the process to evaluate understanding and adoption of target behaviors.	Public Works	SCD and STORM	Ongoing.
EDUC-5	Summarize annual activities for “Public Education and Outreach” component of Annual Report; identify any updates to SWMP document.	Public Works	SCD	The SWMP and Annual Compliance Report submittal is due on or before March 31 of each year.
EDUC-6	Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.	Public Works	SCD and STORM	Ongoing.
EDUC-7	Measure the understanding and adoption of the targeted behaviors for at least one targeted audience in at least one subject area. This requirement can be met individually or as a member of a regional group.	Public Works	SCD and STORM	Evaluation of understanding and adoption of targeted behaviors for one targeted audience was completed prior to the end of 2015 to meet EDUC-8 requirements.
EDUC-8	Use the measurements resulting from EDUC-7 to direct E&O resources no later than February 2, 2016.	Public Works	SCD	Was completed prior to February 2, 2016.

Section 4

Public Involvement

This section provides a description of the Permit requirements related to public involvement, including descriptions of the City's current and planned compliance activities for 2018.

4.1 Permit Requirements

The Permit (Section S5.C.2) requires the City to perform the following tasks over the course of the Permit cycle:

- Provide ongoing opportunities for public involvement through advisory boards or commissions, public hearings, watershed committees, and public participation in developing rate structures and budgets, or other similar activities. The public must be able to participate in the decision-making processes, including development, implementation, and updates of the SWMP.
- Make the SWMP and Annual Compliance Report available to the public, including posting it on the City's Web site by May 31 of each year. Make any other documents required by the Permit to be submitted to Ecology available to the public.

4.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the Permit include the following:

- The City has defined a series of public involvement activities intended to meet the Permit requirements for public involvement in development of the 2018 SWMP Plan. This process involves a presentation of the proposed SWMP elements at a public meeting before the City Council Public Works Committee.
- The City posted the Draft SWMP Plan on the City's Web site, made announcements on the City cable TV channel (TV10), and sent announcements to the Skagit Valley Herald for public comments prior to the public hearing.
- The City will make the 2018 Final SWMP Plan available to the public on the City's Web site, at the public library, and in the Public Works Department main office building.

4.3 Planned 2018 Compliance Activities

The City has an existing stormwater public involvement program that meets the Permit requirements. Actions recommended for continued compliance are included in Table 4-1, which presents the work plan for the 2018 public involvement activities.

Table 4-1. 2018 Public Involvement Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
PI-1	Implement public involvement opportunities for annual SWMP update and reporting process.	Public Works		Prior to finalizing SWMP.
PI-2	Make SWMP and Annual Compliance Report available to the public by posting it on the City Web site, public library, and in the Public Works Department building. Post announcements on Web site and in newspaper.	Public Works	IS	The SWMP and Annual Compliance Report public posting is due on or before May 31 of each year.
PI-3	Summarize annual activities for the “Public Involvement and Participation” component of the Annual Report; identify any updates to the SWMP document.	Public Works	SCD	Due on or before March 31 of each year.

Section 5

Illicit Discharge Detection and Elimination

This section provides a description of the Permit requirements related to IDDE, including descriptions of the City's current and planned compliance activities for 2018.

5.1 Permit Requirements

The Permit (Section S5.C.3) requires the City to perform the following tasks over the course of the Permit cycle:

- Implement an ongoing program to prevent, detect, characterize, trace, and eliminate illicit connections and discharges into the MS4. Maintain a storm sewer system map that includes stormwater system information identified in the Permit (e.g., outfalls, receiving waters, etc.).
- Implement ordinances that prohibit illicit discharges, and a compliance strategy that ensures maintenance standards necessary to detect and address illicit discharges. The ordinance or other regulatory mechanism shall be revised (if needed to meet Permit requirements) no later than February 2, 2018.
- Maintain an ongoing program to detect and identify non-stormwater discharges and illicit connections and to address illicit discharges to the MS4.
- Develop procedures for and complete field screening of at least 40 percent of the MS4 no later than December 31, 2017, and on average 12 percent each year thereafter, and document field screening methodology in Annual Compliance Report.
- Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Track through closeout any illicit discharge reports and actions taken in response, including enforcement actions.
- Maintain an ongoing training program for City staff that may come into contact with or respond to illicit connections or discharges. Train field staff on proper IDDE response procedures and processes and municipal field staff to recognize and report illicit discharges.
- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- Summarize all illicit discharges and connections reported to the City and response actions taken (including enforcement actions) in the Annual Compliance Report; identify any IDDE updates to the SWMP.

5.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the Permit include the following:

- The City maintains much of its storm sewer information system in an electronic format and has produced a storm sewer system map that is updated as new data become available. See Appendix C for a recent version of the City storm sewer system map. The City is continuing to field-verify the City stormwater system in order to validate the City's GIS network model.
- The City's Web site lists the public hotline to report illicit discharges and/or spills.
- The City records all phone calls received to the Public Works Department. The calls reporting illicit discharges are then distributed to the appropriate response authority. Follow-up actions are recorded in the same database.
- City has self-administered IDDE training for new employees, and updated training software.
- Regular online refresher trainings are conducted for City departments.
- The City conducted inspections of portions of the storm sewer system, including screening for illicit discharges and connections.
- The City conducted dry weather visual inspection of outfalls from the Nookachamps Creek drainage area.
- The City responded to reports of illicit discharges and took appropriate actions to eliminate discharges, including following proper reporting procedures.
- The City maintains a database to track all staff training to ensure that all City staff have the appropriate training.
- The City summarizes all illicit discharges and connections, response actions taken, and enforcement actions in its Annual Compliance Reports.

5.3 Planned 2018 Compliance Activities

The City has an existing IDDE program, but will need to update the program to maintain compliance as Ecology phases in additional Permit requirements. Actions recommended for continued compliance are included in Table 5-1, which presents the work plan for the 2018 IDDE activities.

Table 5-1. 2018 Illicit Discharge Detection and Elimination Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
IDDE-1	Maintain IDDE response process including a standard, citywide IDDE response and enforcement SOPs, enhanced by 2016 asset management system upgrade.	Public Works	DS	Ongoing.
IDDE-2	Continue to implement citywide IDDE Program.	Public Works		Ongoing.
IDDE-3	Continue updating storm system map to address data gaps and Permit conditions.	Public Works		Ongoing.
IDDE-4	Implement SOPs for minimizing pollutant releases from permitted non-stormwater discharges (e.g., fire hydrant system flushing, water line flushing, and dechlorinated swimming pools).	Public Works	DS Fire Department	Ongoing.

Table 5-1. 2018 Illicit Discharge Detection and Elimination Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
IDDE-5	Continue to use issue-tracking and resolution system that includes enforcement actions, enhanced by 2016 asset management system upgrade. Capture feedback from public E&O efforts.	Public Works	IS	Ongoing.
IDDE-6	Refresh self-administered intranet IDDE awareness training for all municipal staff in the field.	Public Works	IS	City maintains self-administered training available for new employees and to periodically refresh previously trained employees.
IDDE-7	Publicize hotline for public reporting of spills and other illicit discharges. Create record-keeping system for all calls received and actions taken to report in annual report each year.	Public Works	DS	Ongoing.
IDDE-8	Tracked the number of illicit connection inspections.	Public Works	DS	Ongoing, City planning to continue conducting TV sewer inspections of storm sewers for condition and illicit connection assessment.
IDDE-9	Maintain map that shows the location of all known municipal separate storm sewer outfalls, receiving waters, and structural stormwater BMPs.	Public Works	DS	Ongoing.
IDDE-10	Perform visual inspection of prioritized receiving water bodies. West Mount Vernon outfalls are targeted for 2018.	Public Works		Complete in 2018.
IDDE-11	Summarize annual activities for "Illicit Discharge Detection and Elimination" component of Annual Report; identify any updates to SWMP.	Public Works		The SWMP and Annual Compliance Report submittal is due on or before March 31 of each year.
IDDE-12	Perform field screening (outfalls) of 40 percent of the MS4 no later than December 31, 2017, and on average 12 percent each year thereafter, and document field screening methodology in Annual Compliance Report.	Public Works		Screening of 65 percent of the MS4 was completed by December 31, 2017. Screening of 12 percent on average each year is ongoing.

Section 6

Controlling Runoff from New Development, Redevelopment, and Construction Sites

This section provides a description of the Permit requirements related to controlling runoff from new development, redevelopment, and construction sites, including descriptions of the City's current and planned compliance activities for 2018.

6.1 Permit Requirements

The Permit (Section S5.C.4) requires the City to perform the following tasks over the course of the Permit cycle:

- Implement and enforce an updated program to reduce pollutants in stormwater runoff (i.e., illicit discharges) to the MS4 from new development, redevelopment, and construction site activities no later than December 31, 2016. The program must apply to both private and public projects, including roads, and address all construction/development-associated pollutant sources.
- Adopt regulations (codes and standards) and implement plan review, inspection, and escalating enforcement capability necessary to implement the program in accordance with Permit conditions, including the minimum technical requirements in Appendix 1 of the Permit.
- Review, revise, and make local development-related codes, rules, standards, or other enforceable documents effective to incorporate and require low-impact development (LID) principles and BMPs, and consider the range of issues outlined in Integrating LID into Local Codes: A Guidebook for Local Governments (Puget Sound Partnership, 2012) no later than December 31, 2016. The summary of results of the review and revision process must be included in the annual compliance report no later than March 31, 2017.
- Adopt regulations (codes and standards) and provide provisions to verify adequate long-term operations and maintenance of new post-construction permanent stormwater facilities and BMPs in accordance with Permit conditions, including an annual inspection frequency and/or approved alternative inspection frequency and maintenance standards for private drainage systems as protective as those in Chapter 4 of Volume V of the 2012 Ecology Stormwater Management Manual for Western Washington (2012 Ecology Manual).
- Perform annual inspections of all permanent stormwater treatment and flow control BMPs/facilities discharging to the MS4 that were constructed in accordance with the Permit requirements adopted pursuant to the 2007-2012 permit. Inclusion of LID practices with the 2013-2018 permit will result in the majority of new development and redevelopment projects having to construct new types of onsite stormwater LID facilities. Those facilities, both public and private, will have to be inspected and maintained in perpetuity. This inspection includes facilities on private property, including those associated with single family residences.
- Provide copies of the Notice of Intent (NOI) for construction or industrial activities to representatives of the proposed new development and redevelopment.

- Provide training to staff on updated codes, standards, and SOPs, and create public E&O materials. Develop and define a process to record and maintain all inspections and enforcement actions by staff for inclusion in the Annual Compliance Report.
- Summarize annual activities for the “Controlling Runoff” component of the Annual Compliance Report; identify any updates to the SWMP.

6.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the Permit include the following:

- The City has developed and implemented SOPs to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. The City enforces this program through the Municipal Code. The City currently addresses the minimum requirements, technical thresholds, and definitions requirements of the Permit and has adopted a new code that became effective in December 2016.
- The City has existing programs, codes, standards, SOPs, and data management systems (SmartGov and Eclipse) addressing many of the Permit requirements. The plan review, inspection, and enforcement SOPs will be refined and updated.
- The City adopted the 2012 Ecology Manual effective December 2016.
- The City Code has provisions to allow for LID in the Critical Areas Ordinance. The City also encourages the use of LID at the pre-permit application meeting.
- The City completes the required inspections, including development sites prior to construction, future City infrastructure sites during construction, and future City infrastructure sites post-construction.
- The City completes the required inspections for private infrastructure.
- The City records and maintains inspections results in log books.
- The City inspects new flow control and water quality treatment facilities at the required times and frequency.
- NOI forms are available at the customer service desk and are also mentioned in the Pre-permit application meetings for applicable developments.

6.3 Planned 2018 Compliance Activities

The City has a program to help reduce stormwater runoff from new development and construction sites, but updates will be necessary to maintain compliance as Ecology phases in Permit requirements. Table 6-1 presents the work plan for 2018 SWMP activities related to runoff control for new development, redevelopment, and construction sites.

Table 6-1. 2018 Controlling Runoff from New Development, Redevelopment, and Construction Sites Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
CTRL-1	Continue to implement adopted codes, standards, SOPs, and the 2012 Ecology Manual.	Public Works	DS	Ongoing.
CTRL-2	Apply technical thresholds in Appendix 1 to all sites 1 acre or greater.	Public Works	DS	Ongoing.
CTRL-3	Continue evaluating and implementing the City's stormwater permitting, plan review, inspection, enforcement, and record-keeping processes.	Public Works, DS	CAO	Ongoing.
CTRL-4	Track number of inspections, plan reviews, and enforcement.	Public Works	DS	Ongoing.

Table 6-1. 2018 Controlling Runoff from New Development, Redevelopment, and Construction Sites Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
CRTL-5	Establish program to annually inspect all stormwater treatment flow control facilities (other than catch basins) permitted by the Permittee.	Public Works		Ongoing.
CRTL-6	Conduct staff training and public E&O on implementing Stormwater Manual and Permit requirements.	Public Works	SCD	Ongoing.
CRTL-7	Continue implementing long-term stormwater system operation and maintenance plans for stormwater facilities.	Public Works	DS	Ongoing.
CRTL-8	Summarize annual activities for “Controlling Runoff from New Development, Redevelopment, and Construction Sites” component of Annual Report; identify any updates to SWMP.	Public Works	DS	The SWMP Plan and Annual Compliance Report submittal is due on or before March 31 of each year.

Section 7

Municipal Operations and Maintenance

This section provides a description of the Permit requirements related to municipal operations and maintenance, including descriptions of the City's current and planned compliance activities for 2018.

7.1 Permit Requirements

The Permit (Section S5.C.5) requires the City to perform the following tasks over the course of the Permit cycle:

- Implement an O&M program, with the ultimate goal of preventing or reducing pollutant runoff from MS4 and municipal O&M activities.
- Implement maintenance standards for the MS4 that are at least as protective as those specified in the 2012 Stormwater Management Manual for Western Washington, no later than December 31, 2016.
- Perform inspections of stormwater flow control and treatment facilities and catch basins in accordance with Permit requirements, unless previous inspection data show that a reduced frequency is justified. Have processes in place to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and from municipal O&M activities, including but not limited to those involving streets, parking lots, roads, or highways owned or maintained by the City. Perform inspection of all catch basins and inlets owned and operated by the Permittee at least once no later than August 1, 2017, and every 2 years thereafter in accordance with the Permit.
- Train staff to implement updated processes and document that training.
- Maintain stormwater pollution prevention plans (SWPPPs) for all heavy equipment maintenance or storage yards identified for year-round facilities or yards, and material storage facilities owned or operated by the City.
- Summarize annual activities for the "Municipal Operations and Maintenance" component of the Annual Compliance Report; identify any updates to the SWMP.

7.2 Current Compliance Activities

The City currently has activities and programs that address the Permit requirements. The current compliance activities associated with the above Permit requirements include the following:

- The City operates an O&M program, with the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- The City is currently on track to comply with required municipal stormwater facility inspection frequencies. The City also conducts spot checks of potentially damaged treatment and control facilities. All inspections are recorded in inspection logs.
- The City conducts numerous activities to reduce stormwater impacts associated with runoff from municipal O&M activities, including but not limited to streets, parking lots, and roads owned or maintained by the City. Some of the activities include street sweeping, ditch maintenance, dust control, and pond maintenance.

- Sewer and drainage crews receive training from the Washington Wastewater Collection Personnel Association (WWCPA) biennially.
- The City has developed a SWPPP for the maintenance yard, updated as of December 2017.
- The City conducts regular refresher trainings for City staff.
- The City conducted trainings for all maintenance yard staff in 2010.
- City staff from the Public Works Department, Roads Department, and Parks Department has received training on pollution prevention.
- The City has adopted administrative operating policies and procedures in the form of an Integrated Pest Management Plan (IPM) and a Property and Facility Management Plan for Pollution Reduction in accordance with Section S5.C.5.f of the Permit.
- The City summarizes all associated activities in its Annual Compliance Report, due on March 31 of each year.

7.3 Planned 2018 Compliance Activities

The City conducts many of the Permit-required activities to limit stormwater pollution potential related to its O&M program. However, updates will be necessary to maintain compliance as Ecology phases in additional Permit requirements. Table 7-1 presents the work plan for 2018 SWMP activities related to pollution prevention and O&M activities.

Table 7-1. 2018 Pollution Prevention and Operations Maintenance Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
PPOM-1	Maintain records of inspections and maintenance or repair activities conducted, incorporating 2016 asset management system upgrade.	Public Works		Ongoing.
PPOM-2	Continue to implement City maintenance standards in accordance with Ecology 2012 Manual for City-performed maintenance activities.	CAO	Public Works	Ongoing.
PPOM-3	Maintain inspection program for City-owned or operated stormwater catch basins and for public and private flow control, runoff treatment, and low impact development facilities, where required by and consistent with the schedules identified in the Permit.	Public Works		Ongoing.
PPOM-4	Continue implementing policies and procedures for O&M activities to reduce pollutants in stormwater discharges from lands owned or maintained by the City.	Public Works	Parks and Recreation, Facilities, DS	Ongoing.
PPOM-5	Summarize annual activities for "Municipal Operations and Maintenance" component of Annual Report; identify any updates to SWPPP.	Public Works		The SWMP Plan and Annual Compliance Report submittal is due on or before March 31 of each year.
PPOM-6	Inspect all catch basins and inlets owned or operated by the City at least once by August 1, 2017, and every two years thereafter.	Public Works		All inspections were completed by August 1, 2017; follow-up inspections ongoing.
PPOM-7	Refresh staff training on SWPPP.	Public Works		Ongoing.

Section 8

Monitoring and Assessment

This section provides a description of the Permit requirements related to water quality monitoring, including descriptions of the City's current and planned compliance activities for 2018.

8.1 Permit Requirements

The Permit (Section S8) requires municipalities to conduct water quality sampling and program assessments during this Permit cycle, or to participate in State-conducted programs to meet these requirements:

- Regarding status and trends monitoring in Puget Sound, the City selected Option 1, requiring the City to pay into a collective fund to implement a Regional Stormwater Monitoring Program (RSMP) for small streams and marine nearshore status trends; annual payments to Ecology began August 15, 2014.
- Regarding effectiveness studies, the City selected Option 1, requiring the City to pay into a collective fund to implement RSMP effectiveness studies; annual payments to Ecology began August 15, 2014.
- Pay into a collective fund to implement the RSMP Source Identification Information Repository (SIDIR); annual payments to Ecology began August 15, 2014.

8.2 Current Compliance Activities

The City selected Option 1 for status and trends monitoring and Option 1 for effectiveness studies, and notified Ecology of its selections prior to December 1, 2013.

8.3 Planned 2018 Compliance Activities

The City created a Water Quality Monitoring Program to maintain compliance as Ecology phases in current and future Permit requirements. Table 8-1 presents the work plan for 2018 SWMP monitoring activities.

Table 8-1. 2018 Monitoring Work Plan

Task ID	Task description	Lead	Support	Compliance time frame
MNTR-1	Notify Ecology of selected options for status and trends monitoring and for SWMP effectiveness studies for this Permit cycle.	Public Works		December 1, 2013. Complete.
MNTR-2	Summarize annual monitoring activities for the Annual Report.	Public Works		The SWMP and Annual Compliance Report submittal is due on or before March 31 of each year.
MNTR-3	Continue annual payment into RSMP for small streams and marine nearshore status trends.	Public Works		Annual payments of \$7,574 to Ecology began August 15, 2014.
MNTR-4	Continue annual payment into RSMP for effectiveness studies.	Public Works		Annual payments of \$12,620 to Ecology began August 15, 2014.
MNTR-5	Continue annual payment into RSMP for Source Identification Information Repository.	Public Works		Annual payments of \$1,170 to Ecology began August 15, 2014.

Section 9

Summary

The City of Mount Vernon is currently in compliance with the Phase II Permit and has planned activities for 2018 to ensure continued compliance. There are multiple tasks that the City has completed and several tasks that the City is planning to ensure continuing compliance with the Permit requirements.

On August 1, 2013, a new 5-year Permit cycle began for August 1, 2013, to July 31, 2018. The Permit has been administratively extended through July 31, 2019. New LID and monitoring requirements represent the most significant changes in the current Permit; the City was required to implement LID in City codes, policies, programs and standards during the Permit term. Ecology has also published an updated 2012 Stormwater Management Manual for Western Washington (subsequently updated in 2014); the City was required to adopt the updated Manual or an equivalent during the Permit term.

The City administers its SWMP through a SWMP Plan updated annually, and reports progress to Ecology in an Annual Report.

The Public Education and Outreach Program has been implemented through the City's contract with the Skagit Conservation District (SCD), which has reached out with useful information and offered participatory activities to the general public, school districts, business owners, commercial property owners, the agricultural community, and the industrial community. In addition, the City works with the Northern Stormwater Outreach Group (SOG) and the Skagit County Public Health Department through the source control inspection program.

Mount Vernon has developed a system for notifying the public, provides opportunities for the public to comment on the SWMP document, and each year presents the document to the City Council. These opportunities allow the public to be involved in developing the City's SWMP.

The City has an ongoing IDDE Program, which includes a spill hotline. Each year the hotline receives calls from educated citizens who are interested in protecting stormwater quality. City staff have been trained to identify and respond to illicit discharges and connections, and the City tracks inspections and field responses and conducts appropriate reporting for IDDE activities. Mount Vernon works with the SCD to distribute additional educational materials directed at IDDE.

The City has adopted and is currently implementing the 2012 Ecology Manual for controlling runoff from new development, redevelopment, and construction sites. To comply with the Permit, LID codes and standards were updated by December 31, 2016; the City now requires the use of LID techniques where feasible for new development and redevelopment, in order to mimic natural runoff patterns.

The City operates and maintains the MS4 to comply with Phase II Permit requirements, including required O&M practices (e.g., inspection, cleaning, and other maintenance).

The City participates in state-wide monitoring activities by making annual payments to the RSMP collective fund.

Additional information on the City's NPDES program can be found online at <http://www.mountvernonwa.gov/426/NPDES-Stormwater-Permit>.

Appendix A:

Abbreviations and Definitions from Permit

Appendix A

Abbreviations and Definitions from Permit

The following definitions and abbreviations are taken directly from the Phase II Permit and are reproduced here for the reader's convenience.

40 CFR means Title 40 of the Code of Federal Regulations, which is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government.

AKART means all known, available, and reasonable methods of prevention, control and treatment. See also State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.

All known, available and reasonable methods of prevention, control and treatment refers to the State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.

Applicable TMDL means a TMDL which has been approved by EPA on or before the issuance date of this Permit, or prior to the date that Ecology issues coverage under this Permit, whichever is later.

Beneficial Uses means uses of waters of the state, which include but are not limited to use for domestic, stock watering, industrial, commercial, agricultural, irrigation, mining, fish and wildlife maintenance and enhancement, recreation, generation of electric power and preservation of environmental and aesthetic values, and all other uses compatible with the enjoyment of the public waters of the state.

Best Management Practices are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by Ecology that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State.

BMP means Best Management Practice.

Bypass means the diversion of stormwater from any portion of a stormwater treatment facility.

Census defined urban area means Urbanized Area.

Circuit means a portion of a MS4 discharging to a single point or serving a discrete area determined by traffic volumes, land use, topography or the configuration of the MS4.

Component or **Program Component** means an element of the Stormwater Management Program listed in S5 Stormwater Management Program for Cities, Towns, and Counties or S6 Stormwater Management Program for Secondary Permittees, S7 Compliance with Total Maximum Daily Load Requirements, or S8 Monitoring of this permit.

Conveyance system means that portion of the municipal separate storm sewer system designed or used for conveying stormwater.

Co-Permittee means an owner or operator of an MS4 which is in a cooperative agreement with at least one other applicant for coverage under this permit. A Co-Permittee is an owner or operator of a regulated MS4 located within or in proximity to another regulated MS4. A Co-Permittee is only responsible for permit

conditions relating to discharges from the MS4 the Co-Permittee owns or operates. See also 40 CFR 122.26(b)(1).

CWA means Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. (6-483 and Pub. L. 97-117, 33 U.S.C. 1251 et seq.).

Director means the Director of the Washington State Department of Ecology, or an authorized representative.

Discharge Point means the location where a discharge leaves the Permittee's MS4 through the Permittee's MS4 facilities/BMPs designed to infiltrate.

Entity means a governmental body, or a public or private organization.

EPA means the U.S. Environmental Protection Agency.

General Permit means a permit which covers multiple dischargers of a point source category within a designated geographical area, in lieu of individual permits being issued to each discharger.

Ground water means water in a saturated zone or stratum beneath the surface of the land or below a surface water body. Refer to chapter 173-200 WAC.

Hazardous substance means any liquid, solid, gas, or sludge, including any material, substance, product, commodity, or waste, regardless of quantity, that exhibits any of the physical, chemical, or biological properties described in WAC 173-303-090 or WAC 173-303-100.

Heavy equipment maintenance or storage yard means an uncovered area where any heavy equipment, such as mowing equipment, excavators, dump trucks, backhoes, or bulldozers are washed or maintained, or where at least five pieces of heavy equipment are stored on a long-term basis.

Highway means a main public road connecting towns and cities.

Hydraulically near means runoff from the site discharges to the sensitive feature without significant natural attenuation of flows that allows for suspended solids removal. See Appendix 7 Determining Construction Site Sediment Damage Potential for a more detailed definition.

Hyperchlorinated means water that contains more than 10 mg/Liter chlorine.

Illicit connection means any infrastructure connection to the MS4 that is not intended, permitted or used for collecting and conveying stormwater or non-stormwater discharges allowed as specified in this permit (S5.C.3 and S6.D.3). Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the MS4.

Illicit discharge means any discharge to a MS4 that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in this permit (S5.C.3 and S6.D.3).

Impervious surface means a non-vegetated surface area that either prevents or retards the entry of water into the soil mantle as under natural conditions prior to development. A nonvegetated surface area which causes water to run off the surface in greater quantities or at an increased rate of flow from the flow present under natural conditions prior to development. Common impervious surfaces include, but are not limited to, roof tops, walkways, patios, driveways, parking lots or stormwater areas, concrete or asphalt paving, gravel roads, packed earthen materials, and oiled, macadam or other surfaces which similarly impede the natural infiltration of stormwater.

Land disturbing activity means any activity that results in a change in the existing soil cover (both vegetative and non-vegetative) and/or the existing soil topography. Land disturbing activities include, but are not limited to clearing, grading, filling and excavation. Compaction that is associated with stabilization of structures and road construction shall also be considered land disturbing activity. Vegetation maintenance

practices, including landscape maintenance and gardening, are not considered land disturbing activity. Stormwater facility maintenance is not considered land disturbing activity if conducted according to established standards and procedures.

LID means Low Impact Development. **LID BMP** means low impact development best management practices.

LID Principles means land use management strategies that emphasize conservation, use of onsite natural features, and site planning to minimize impervious surfaces, native vegetation loss, and stormwater runoff.

Low Impact Development means a stormwater and land use management strategy that strives to mimic pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration by emphasizing conservation, use of on-site natural features, site planning, and distributed stormwater management practices that are integrated into a project design.

Low impact development best management practices means distributed stormwater management practices, integrated into a project design, that emphasize pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration. LID BMPs include, but are not limited to, bioretention, rain gardens, permeable pavements, roof downspout controls, dispersion, soil quality and depth, vegetated roofs, minimum excavation foundations, and water re-use.

Material Storage Facilities means an uncovered area where bulk materials (liquid, solid, granular, etc.) are stored in piles, barrels, tanks, bins, crates, or other means.

Maximum Extent Practicable refers to paragraph 402(p)(3)(B)(iii) of the federal Clean Water Act which reads as follows: Permits for discharges from municipal storm sewers shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques, and system, design, and engineering methods, and other such provisions as the Administrator or the State determines appropriate for the control of such pollutants.

MEP means Maximum Extent Practicable.

MS4 means municipal separate storm sewer system.

Municipal Separate Storm Sewer System means a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains): (i) owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of Washington State; (ii) designed or used for collecting or conveying stormwater; (iii) which is not a combined sewer; (iv) which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.; and (v) which is defined as “large” or “medium” or “small” or otherwise designated by Ecology pursuant to 40 CFR 122.26.

National Pollutant Discharge Elimination System means the national program for issuing, modifying, revoking, and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Federal Clean Water Act, for the discharge of pollutants to surface waters of the state from point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington State Department of Ecology.

Native vegetation means vegetation comprised of plant species, other than noxious weeds, that are indigenous to the coastal region of the Pacific Northwest and which reasonably could have been expected to naturally occur on the site. Examples include trees such as Douglas Fir, western hemlock, western red cedar, alder, big-leaf maple; shrubs such as willow, elderberry, salmonberry, and salal; and herbaceous plants such as sword fern, foam flower, and fireweed.

New development means land disturbing activities, including Class IV General Forest Practices that are conversions from timber land to other uses; structural development, including construction or installation of a building or other structure; creation of hard surfaces; and subdivision, short subdivision and binding site plans, as defined and applied in chapter 58.17 RCW. Projects meeting the definition of redevelopment shall not be considered new development. Refer to Appendix 1 for a definition of hard surfaces.

New Permittee means a city, town, or county that is subject to the *Western Washington Municipal Stormwater General Permit* and was not subject to the permit prior to August 1, 2013.

New Secondary Permittee means a Secondary Permittee that is covered under a municipal stormwater general permit and was not covered by the permit prior to August 1, 2013.

NOI means Notice of Intent.

Notice of Intent means the application for, or a request for coverage under a General Permit pursuant to WAC 173-226-200.

Notice of Intent for Construction Activity means the application form for coverage under the *Construction Stormwater General Permit*.

Notice of Intent for Industrial Activity means the application form for coverage under the *General Permit for Stormwater Discharges Associated with Industrial Activities*.

NPDES means National Pollutant Discharge Elimination System.

Outfall means a point source as defined by 40 CFR 122.2 at the point where a discharge leaves the Permittee's MS4 and enters a surface receiving water body or surface receiving waters. Outfall does not include pipes, tunnels, or other conveyances which connect segments of the same stream or other surface waters and are used to convey primarily surface waters (i.e., culverts).

Permittee unless otherwise noted, the term "Permittee" includes city, town, or county Permittee, Co-Permittee, New Permittee, Secondary Permittee, and New Secondary Permittee.

Physically Interconnected means that one MS4 is connected to another storm sewer system in such a way that it allows for direct discharges to the second system. For example, the roads with drainage systems and municipal streets of one entity are physically connected directly to a storm sewer system belonging to another entity.

Project site means that portion of a property, properties, or right-of-ways subject to land disturbing activities, new hard surfaces, or replaced hard surfaces. Refer to Appendix 1 for a definition of hard surfaces.

QAPP means Quality Assurance Project Plan.

Qualified Personnel means someone who has had professional training in the aspects of stormwater management for which they are responsible and are under the functional control of the Permittee. Qualified Personnel may be staff members, contractors, or volunteers.

Quality Assurance Project Plan means a document that describes the objectives of an environmental study and the procedures to be followed to achieve those objectives.

RCW means the Revised Code of Washington State.

Receiving water body or receiving waters means naturally and/or reconstructed naturally occurring surface water bodies, such as creeks, streams, rivers, lakes, wetlands, estuaries, and marine waters, or ground water, to which a MS4 discharges.

Redevelopment means, on a site that is already substantially developed (i.e., has 35% or more of existing hard surface coverage), the creation or addition of hard surfaces; the expansion of a building footprint or addition or replacement of a structure; structural development including construction, installation or

expansion of a building or other structure; replacement of hard surface that is not part of a routine maintenance activity; and land disturbing activities. Refer to Appendix 1 for a definition of hard surfaces.

Regional Stormwater Monitoring Program means, for all of western Washington, a stormwater-focused monitoring and assessment program consisting of these components: status and trends monitoring in small streams and marine nearshore areas, stormwater management program effectiveness studies, and a source identification information repository (SIDIR). The priorities and scope for the RSMP are set by a formal stakeholder group. For this permit term, RSMP status and trends monitoring will be conducted in the Puget Sound basin only.

Regulated Small Municipal Separate Storm Sewer System means a Municipal Separate Storm Sewer System which is automatically designated for inclusion in the Phase II stormwater permitting program by its location within an Urbanized Area, or by designation by Ecology and is not eligible for a waiver or exemption under S1.C.

RSMP means Regional Stormwater Monitoring Program.

Runoff is water that travels across the land surface and discharges to water bodies either directly or through a collection and conveyance system. See also “Stormwater.”

Secondary Permittee is an operator of a regulated small MS4 which is not a city, town or county. Secondary Permittees include special purpose districts and other public entities that meet the criteria in S1.B.

Sediment/Erosion-Sensitive Feature means an area subject to significant degradation due to the effect of construction runoff, or areas requiring special protection to prevent erosion. See Appendix 7 Determining Construction Site Sediment Transport Potential for a more detailed definition.

Shared water bodies means water bodies, including downstream segments, lakes and estuaries that receive discharges from more than one Permittee.

SIDIR means Source Identification Information Repository.

Significant contributor means a discharge that contributes a loading of pollutants considered to be sufficient to cause or exacerbate the deterioration of receiving water quality or instream habitat conditions.

Small Municipal Separate Storm Sewer System means an MS4 that is not defined as “large” or “medium” pursuant to 40 CFR 122.26(b)(4) & (7) or designated under 40 CFR 122.26 (a)(1)(v).

Source control BMP means a structure or operation that is intended to prevent pollutants from coming into contact with stormwater through physical separation of areas or careful management of activities that are sources of pollutants. The SWMMWW separates source control BMPs into two types. Structural Source Control BMPs are physical, structural, or mechanical devices, or facilities that are intended to prevent pollutants from entering stormwater. Operational BMPs are non-structural practices that prevent or reduce pollutants from entering stormwater. See Volume IV of the SWMMWW (2012) for details.

Stormwater means runoff during and following precipitation and snowmelt events, including surface runoff, drainage or interflow.

Stormwater Associated with Industrial and Construction Activity means the discharge from any conveyance which is used for collecting and conveying stormwater, which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant, or associated with clearing, grading and/or excavation, and is required to have an NPDES permit in accordance with 40 CFR 122.26.

Stormwater Management Program means a set of actions and activities designed to reduce the discharge of pollutants from the MS4 to the MEP and to protect water quality, and comprising the components listed in S5 (for cities, towns, and counties) or S6 (for Secondary Permittees) of this Permit and any additional actions necessary to meet the requirements of applicable TMDLs pursuant to S7 *Compliance with TMDL Requirements*, and S8 *Monitoring and Assessment*.

Stormwater Treatment and Flow Control BMPs/Facilities means detention facilities, treatment BMPs/facilities, bioretention, vegetated roofs, and permeable pavements that help meet Appendix 1 Minimum Requirements #6 (treatment), #7 (flow control), or both.

SWMMWW or Stormwater Management Manual for Western Washington means *Stormwater Management Manual for Western Washington (as amended in 2014)*.

SWMP means Stormwater Management Program.

TMDL means Total Maximum Daily Load.

Total Maximum Daily Load means a water cleanup plan. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards, and an allocation of that amount to the pollutant's sources. A TMDL is the sum of the allowable loads of a single pollutant from all contributing point and nonpoint sources. The calculation must include a margin of safety to ensure that the water body can be used for the purposes the state has designated. The calculation must also account for seasonable variation in water quality. Water quality standards are set by states, territories, and tribes. They identify the uses for each water body, for example, drinking water supply, contact recreation (swimming), and aquatic life support (fishing), and the scientific criteria to support that use. The Clean Water Act, section 303, establishes the water quality standards and TMDL programs.

Tributary conveyance means pipes, ditches, catch basins, and inlets owned or operated by the Permittee and designed or used for collecting and conveying stormwater.

UGA means Urban Growth Area.

Urban Growth Area means those areas designated by a county pursuant to RCW 36.70A.110.

Urbanized Area is a federally-designated land area comprising one or more places and the adjacent densely settled surrounding area that together have a residential population of at least 50,000 and an overall population density of at least 1,000 people per square mile. Urbanized Areas are designated by the U.S. Census Bureau based on the most recent decennial census.

Vehicle Maintenance or Storage Facility means an uncovered area where any vehicles are regularly washed or maintained, or where at least 10 vehicles are stored.

Water Quality Standards means Surface Water Quality Standards, chapter 173-201A WAC, Ground Water Quality Standards, chapter 173-200 WAC, and Sediment Management Standards, chapter 173-204 WAC.

Waters of the State includes those waters as defined as "waters of the United States" in 40 CFR Subpart 122.2 within the geographic boundaries of Washington State and "waters of the state" as defined in chapter 90.48 RCW which includes lakes, rivers, ponds, streams, inland waters, underground waters, salt waters and all other surface waters and water courses within the jurisdiction of the State of Washington.

Waters of the United States refers to the definition in 40 CFR 122.2.

Appendix B:

2013-2018 Western Washington Phase II Municipal Stormwater Permit Implementation Schedule (Draft)

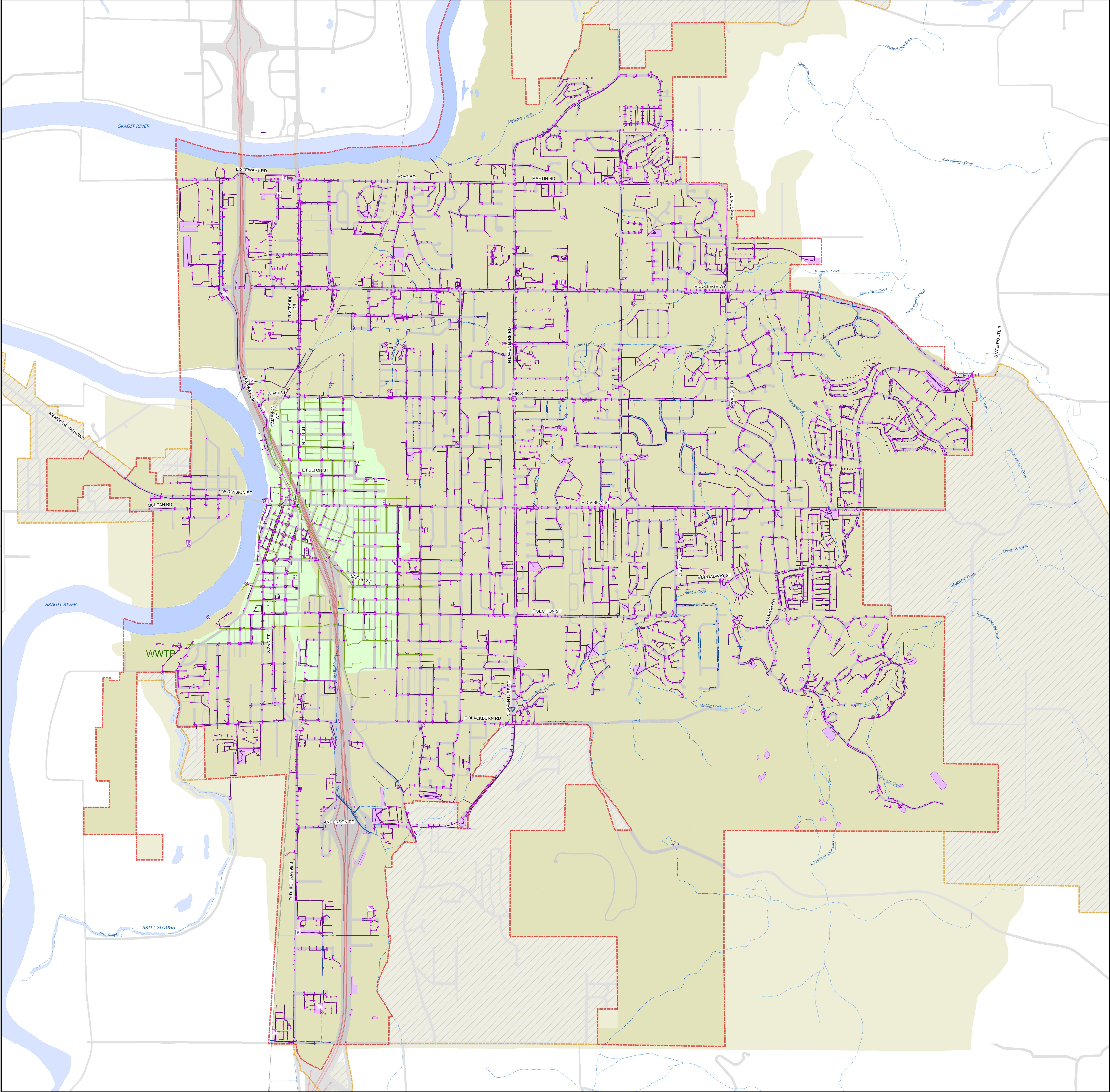
(Courtesy Cities of Covington and SeaTac)

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LEGEND:  Effective & Expiration Dates of Permit  Ongoing Requirement  Permit Deadline

Appendix C:

Mount Vernon Storm Sewer System Map



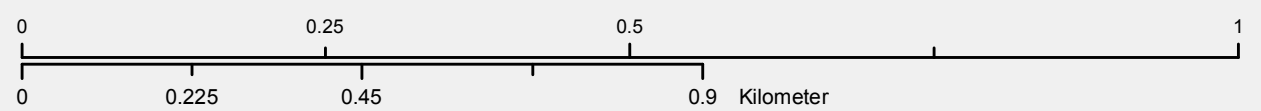
Map Revised: February, 2018

City of Mount Vernon Disclaimer: The information included on this map has been compiled by City of Mount Vernon staff from a variety of sources. The City of Mount Vernon makes no representations or warranties, expressed or implied, as to the accuracy, completeness, timeliness, or rights to the use of such information. The City of Mount Vernon shall not be liable for any general, special, indirect, incidental, or consequential damages including, but not limited to, lost revenues or lost profits resulting from the use or misuse of the information contained in this map.

City of Mount Vernon Public Works Department

- | | | | |
|---------------------|-----------------------|---------------|---------------------|
| Stormwater Line | Catch Basins | City Boundary | MS4 Area |
| Storm Culvert | Pumpstation | UGA Boundary | Combined Sewer Area |
| Combined Sewer Line | Outfalls >=12" | Railroad | |
| | Detention/WQ Facility | Stream | |

City of Mount Vernon Stormwater System



City of Mount Vernon
1024 Cleveland Avenue
Mount Vernon, WA 98273
Phone: (360) 336-6204



Brown AND
Caldwell

Seattle Office

701 Pike Street
Suite 1200
Seattle, WA 98101
T 206.624.0100

SKAGIT CONSERVATION DISTRICT STORMWATER EDUCATION PROGRAM 2017 REPORT



Figure 1 Fall 2017 Watershed Masters - Values & Functions of Estuaries Field Day

*Submitted by: Kristi Carpenter, Skagit Conservation District
for:*

*City of Mount Vernon
City of Burlington
City of Sedro-Woolley
City of Anacortes
Skagit County*

Storm Water Education Program Summary

This progress report summarizes the storm water public education and outreach and the public participation and involvement activities that were completed by the Skagit Conservation District over the period January 1, 2017 through December 31, 2017. The primary purpose of the Skagit Conservation District's Storm Water Education Program is to assist local jurisdictions with compliance efforts for the "Public Education and Outreach" requirements of the NPDES storm water permit by facilitating greater public awareness of the sensitivity of local surface waters, their beneficial uses, the detrimental effects of polluted stormwater and illicit discharges, and measures that can be taken to reduce stormwater pollution (inspiring behavior change).

Skagit MS4 Partners: The Skagit Conservation District's Stormwater Education Program is a local partnership formed to develop and implement a comprehensive water resource education, outreach, and public involvement program. The Skagit Conservation District has formed partnerships with the City of Mount Vernon, City of Burlington, City of Sedro-Woolley, City of Anacortes, and Skagit County. With the exception of the Skagit Conservation District, all partners are MS4 communities required to prepare Stormwater Pollution Prevention Plans (SWPPP) in accordance with Phase II of the Clean Water Act. The purpose of the partnership is to work together cooperatively and share a common message, avoid duplication of efforts (which in turn will save money and resources), utilize existing programs when possible and to share resources and expertise.

Program Overview: An informed, knowledgeable, and engaged community is crucial to the success of a stormwater management program. Between 2011-2017, the Skagit Conservation District, in partnership with the Cities of Anacortes, Burlington, Mount Vernon, and Sedro-Woolley, and Skagit County, has provided a comprehensive and multifaceted series of programs and opportunities aimed at educating, engaging, and inspiring local stewardship so that the goal of reducing stormwater pollution impacts to our local waterways can be achieved. A variety of education methods and stewardship opportunities were incorporated to reach a wide-range of interest groups, including homeowners, businesses, contractors, youth, and the general public.

2017 Activities

1. PUBLIC PARTICIPATION AND INVOLVEMENT

Task 1.1 Host Private Storm Water Facility Maintenance Workshop

A Private Storm Water Facility Maintenance Workshop was coordinated and held at the Port of Skagit County on July 24, 2017 with **35 attendees**. The agenda included a municipal overview provided by Lori Wight, Skagit County Public Works; Detention Pond Maintenance: Nuts and Bolts provided by Reid Armstrong,,



Figure 2 The 2017 Detention Pond Maintenance Workshop was held on July 24th with 35 attendees.

Kulshan Services, LLC; and Involving your Neighborhood Community provided by Kristi Carpenter, Skagit Conservation District. The last hour of the training included a "hands on" field tour to stormwater detention pond facilities on Port of Skagit County property for training on how to inspect and maintain your stormwater detention facility. Handbooks were compiled by SCD staff and provided to all attendees. Promotion of the event was conducted via direct mailing to HOA contact lists in each jurisdiction, press releases provided to all local media, two promotional ads in the local newspapers, promotional fliers distributed throughout the community and posted on websites and SCD and County facebook, and through SCD and partners email distribution lists.

Task 1.2 Watershed Masters Volunteer Training Program

The 2017 Watershed Masters Volunteer Training program was conducted September 26th through November 15th (8-week training) with **24** individuals completing the training. The overall goal of the program is *"to increase public awareness on a variety of water quality problems and solutions and to promote community stewardship in regards to water quality."*

Participants attend 8 evening lecture sessions and 3 Saturday field days. The training is provided and supported by local and state experts. The program is designed to educate and involve interested community residents (age 17 and up) and to give participants information on ways to make positive behavioral changes in their own lives to protect water quality and to inspire local stewardship of our water resources.

Volunteers who complete the training return forty hours of service. SCD staff works with each Watershed Master Volunteer who has completed the training to design a plan of action for returning the forty hours of training. Watershed Masters are encouraged to pursue projects that best meet their interest, skills, and schedule.

Over the years, participants of the Watershed Masters program have played a leading role in promoting watershed stewardship throughout our community by implementing sustainable landscaping practices in their own backyard, participating in local stewardship projects, and educating their friends, family, and neighbors.

Over 5,050 volunteer hours were reported by Watershed Master Participants in 2017. Over the last year, volunteer activities have included *participation in the Skagit Stream Team, Storm Team, and Marine Biotxin monitoring programs, providing volunteer support for the raingarden and compost sock terrace project at the Bay View United Methodist Church (one*



Figure 3 The Fall 2017 Watershed Masters pose for the camera during an evening field tour at Taylor Shellfish Farms.



Figure 4 On Nov. 29th, a group of Watershed Master Volunteers planted 180 plants at the Bay View United Methodist Church Rain Garden and Compost Sock Terrace project.

volunteer with EcoPro Certification also designed the landscape plan for the rain garden and terrace), providing staff support in hosting the “Puget Sound Starts Here” display and educational activities at numerous local events, assisting with stream restoration projects throughout the community, conducting heron foraging counts, conducting salmon spawning surveys, leading tours at the Marblemount Fish Hatchery, providing presentations on sustainable gardening at local workshops, maintenance work parties and leading community tours at the Naturescape Demonstration Garden (installed with support from WSM in 2014 at the Alger Community Hall), storm drain labeling, assisting with maintenance at the Native Plant Demonstration Garden on Memorial Hwy., participating in the community wildlife habitat program, conducting surf smelt surveys in Fidalgo Bay, assisting staff in planning/coordinating community events and workshops, such as the Sustainable Samish Garden Tour, Kids in Nature event, and more.

In addition, this year a Watershed Master, Nicolette Harrington, has been working with SCD staff and has recruited 7 local artists to conduct a "Rainworks Art Trail" in Mount Vernon which will have a water theme. We are excited about the opportunity to educate about stormwater through this fun art project. Rainworks images only appear when it is raining. The Rainworks Art trail is scheduled to kick off on April 1, 2018.



Figure 5 This image showing how stormwater ends up in the nearest stream was designed by local artist Stella Spring and will be included on the Rainworks Art Trail in April 2018

A few examples of comments from 2017 participants:

- *Excellent program! Incredibly valuable information. Thank you for sharing this class!*
- *I had such a wonderful time in this class, and I can't wait to work with Skagit Conservation District and other organizations to complete my 40 volunteer hours.*
- *I was very impressed by the professionals who shared their experience. I found them passionate and knowledgeable. I appreciated the good communication and coordination by Kristi and staff.*
- *This has been a wonderful and enriching program. It was very well organized. I am energized to give back the knowledge learned through the class.*
- *I have enjoyed this class so much. Many of the experiences are always going to be rememberable...*

Task 1.3 Skagit Stream Team

The Skagit Stream Team Program was established in 1998 to educate and involve local citizens in the protection and stewardship of local streams. Urban stream reaches, including Kulshan Creek & the Trumpeter basin (Mount Vernon), Gages Slough (Burlington), and Ace of Hearts (Anacortes) were added to the program over the last 7 years as part of this interlocal agreement. In addition, Stream Team volunteers participated in a 3 year study of Brickyard Creek in Sedro-Woolley between 2009 &

2011. All streams are monitored twice a month with the exception of Gages Slough, which is monitored monthly.

The goals of the Skagit Stream Team program are to:

1) Inspire community stewardship of water resources by educating local citizens about land use and non-point sources of pollution and involving them in the process of water quality data gathering; 2) to develop and implement a routine sampling program that can be used to assess water quality trends, characterize the existing water quality of priority freshwater drainages, and determine how water quality conditions compare to State Standards; 3) to document improvements to water quality as a result of the implementation of Best Management Practices and storm water prevention measures; and 4) to teach community volunteers the sampling and analytical techniques used by environmental professionals, how to manage the data collected and create a database, and the importance of establishing a long-term water quality monitoring program.



Figure 6 Pictured above, new Stream Team volunteers learn about Stream Ecology during the annual Stream Team training in September.

Parameters measured by Stream Team volunteers include fecal coliform (FC) bacteria, dissolved oxygen (DO), water temperature, turbidity and total depth.

- 5 Stream Team volunteers monitored the water quality of Ace of Hearts Creek in Anacortes over the 2016/2017 monitoring season (Stream Team monitoring year is October through September). The Anacortes Waste Water Treatment Plant conducts lab analysis for this program.
- 12 Stream Team volunteers monitored Kulshan Creek and Trumpeter Basin in Mount Vernon.

Mount Vernon Waste Water Treatment Plant conducts lab analysis for Kulshan and Trumpeter.

- 2 Stream Team volunteers monitored Gages Slough through the 2016/17 sampling season. Burlington Waste Water Treatment Plant conducted lab analysis for the Gages Slough Stream Team.
- **74** Stream Team volunteers participated in the 2016/17 Stream Team program overall, with a total of **71** currently participating in the 2017/2018 program.
- Other streams monitored by Stream Team volunteers include Joe Leary Slough, Bay View, Samish River (upper and lower), Nookachamps Creek (upper and lower), and No Name Slough. In addition, 8 volunteers conducted storm event sampling in the Friday Creek watershed during the 2016/2017 season in support of the Padilla Bay TMDL and Clean Samish Initiative (Storm Team).



Figure 7 Kulshan Stream Team volunteer, Maria Magana, teaches kids about water quality monitoring and the value of healthy streams at the annual Kids in Nature event on Aug. 19, 2017.

- A Total of 50 monitoring stations were monitored twice a month by Stream Team volunteers, with the exception of Gages Slough which is monitored monthly.
- The Annual Year-End Stream Team Celebration and Recognition event was coordinated and held on June 10, 2017. 74 Stream Team/Storm Team volunteers were recognized.
- **1,200+ Stream Team volunteer hours** reported for the 2016/17 Stream Team program.
- The Annual Stream Team training was coordinated and held Sept. 6th, 7th, and 9th.
- Data was entered on excel spreadsheet.
- The 2016/17 Annual Stream Team Report is in progress and will be completed in March 2018.
- The annual “How Clean is Your Neighborhood Stream?” meeting was coordinated and held on March 1, 2017 with **26 attendees**. The purpose of the meeting is to present the annual Stream Team report and provide a water quality update to the community. Rick Haley, Skagit County Water Analyst, also provided an update on the County’s water quality monitoring program at this annual public meeting.

Task 1.4 Storm Drain Labeling Program

Storm drain marking kits are available at the Skagit Conservation District. Community groups and residents are encouraged to participate in the protection of water quality by marking storm drains in their neighborhoods and throughout the community.

- Staff recruited and provided support to volunteers in Mount Vernon. Over **230 storm drains** were labeled. Efforts will continue in the spring of 2018.
- Mount Vernon High School Marine Science class labeled 46 storm drains throughout the high school campus.
- Eagle Scouts labels 108 drains in the Riverside Drive neighborhood and business district.
- A Fall 2016 Watershed Master Volunteer labeled 97 drains in the LaVenture neighborhood.
- Staff coordinated with volunteer and scout groups to continue labeling in Burlington beginning spring 2018.
- 175 + promotional fliers were distributed at local events, including the Detention Pond Maintenance Workshop, Watershed Masters, Backyard Conservation, and Stream Team trainings and to local schools. The program is also promoted on SCD’s website and Facebook media.



Figure 8 Mount Vernon HS Marine Science class labeled 46 storm drains throughout the high school campus.

2. PUBLIC EDUCATION AND OUTREACH

Task 2.1 Backyard Conservation Stewardship Program

The Backyard Conservation Stewardship Short Course targets local homeowners and provides education on sustainable landscape practices as promoted by the Sustainable Sites Initiative.

Program objectives:

- *Participants will learn practices that can be applied in their own backyards to help reduce storm water pollution and create a healthy and more sustainable environment.*
- *Participants will be provided with the tools and resources to design sustainable, natural, backyard landscapes.*
- *To encourage community participation in the Backyard Wildlife Habitat and/or Backyard Sanctuary Certification programs.*
- *To create a network of community residents willing to share their love of gardening and the outdoors to inspire others to create environmentally friendly gardening practices that will benefit our community.*

Topics included in the 6-week short course include proper use and disposal of pesticides, herbicides, and fertilizers (and use of non-toxic alternatives), use of native plants in landscaping, reducing size of lawn, gardening for wildlife, using bees as pollinators, applying low impact development/rain gardens, use of permeable pavement for driveways and patios, composting, managing non-native invasive plants, how to build healthy soils, proper disposal of pet waste, preventive car maintenance, and more. Sessions are taught by a knowledgeable and enthusiastic slate of local and state experts.

- The 2017 Backyard Conservation Stewardship Short Course was held every Wednesday evening beginning March 22nd and continued through April 26th (6 weeks). The program also included two field tours, including a visit to the WSU Extension Discovery Garden (composting, soils, native plants, and Integrated Pest Management (IPM)), and a Saturday field tour of resident's homes who have taken the class in previous years and have employed sustainable backyard practices on their properties.
- **65 individuals completed the 2017 Backyard Conservation Short Course.**

Outcomes: The Backyard Conservation Stewardship Short Course has played a key role in our efforts to increase levels of voluntary implementation of conservation practices on private lands in both urban and rural areas of our community and to promote natural yard care principles. In addition to making sustainable change in



Figure 9 The 2017 Backyard Conservation Stewardship class poses in front of the Skagit County Administration Building during after a tour of the County's rain garden and LID parking lot.



Figure 10 Backyard Conservation class learning about rain gardens and rain garden plants during a plant tour at Azusa Farm and Gardens

their own backyards, four grassroots community volunteer groups have now convened from this program, including the Fidalgo Backyard Wildlife Habitat Group in Anacortes, Skagit Valley Backyard Wildlife Habitat Team (Mount Vernon, Conway, LaConner, & Bow), the Friday Creek Habitat Stewards, which includes Burlington and Sedro-Woolley, and the "Backyard Eco Garden Club" emerged from the 2016 class. The Fidalgo, Skagit, and Friday Creek habitat teams have registered our communities with the National Wildlife Federation's Community Wildlife Habitat Program (Fidalgo and Skagit have already received national recognition as a "Community Wildlife Habitat," and Friday Creek is in progress). Over 1,000 Skagit County residents, and including schools, parks, farms, & businesses, have certified their yards through this program.



Figure 11 40 participants of the 2017 Backyard Conservation Short Course volunteered their time to plant a native plant hedgerow at the Sedro-Woolley Food Forest in celebration of Earth Day (April 22nd).

- Staff provided ongoing support and assistance to Backyard Conservation Stewardship program volunteers throughout the year.
- Staff provided ongoing support to the new "Backyard Eco Garden Club," and attended monthly meetings.
- Staff hosted and facilitated monthly meetings with the Friday Creek Habitat Stewards.
- The habitat team volunteer groups hosted educational displays at numerous community events, including local farmers markets, Alger Fun Raiser, Skagit River Salmon Festival, Festival of Family Farms, Kids in Nature: Families Outdoors at Pomona Grange Park, DASSH 5k Family Fun Run/Walk, Storming the Sound, Sustainable Samish Garden Tour,

and at numerous related workshops held in the community.

- The volunteers hosted 4 garden tours and 2 maintenance work parties at the Demonstration Naturescape Garden at the Alger Community Hall. The garden was also an outcome of the Backyard Conservation Stewardship Short Course engaging the support of volunteers and community neighbors – the garden includes a stream enhancement project, a pollinator habitat garden, wildlife habitat garden, and an opportunity to showcase native plants and drought tolerant plants that can be used in the home garden.



Figure 12 The Backyard Conservation Short Course has inspired the formation of four community backyard wildlife habitat volunteer groups. Pictured, the Friday Creek Habitat Group hosts an education display and activities at Taylor Shellfish Farms during the Festival of Family Farms on Oct. 7th & 8th 2017.

- Other projects undertaken over the year by the backyard conservation volunteers with support from SCD included:
 - 1) May 21st – Garden Swap & Sale – 175 participants
 - 2) June 24th – Gardening for Wildlife Family Event (Watershed Art for Learning at Padilla Bay Research Reserve) – 91 attendees.
 - 3) July 16th – Sustainable Samish Garden Tour – 300+ attendees.
 - 4) August 19th – Kids in Nature: Families Outdoors at Pomona Grange Park – 65+ attendees

Task 2.2 Resource Materials/Education for Local Schools

Skagit Conservation District provides support to local schools by providing educational resources and presentations throughout the year.

- Educational packets were prepared and distributed to 487 local teachers. The packets include information on stormwater, watersheds, and other resources and educational programs available for teachers and classrooms through the Skagit Conservation District. Promotion of the EnviroScape Model classroom presentations (stormwater runoff and non-point source pollution) was also distributed.
- 48 storm water education presentations, using the EnviroScape watershed model, were conducted in 2017 at local elementary schools reaching over 1,140 Skagit County students in the following jurisdictions:

Burlington: 9 presentations to 239 students

Mount Vernon: 23 presentations to 520 students

Sedro-Woolley: 6 presentations to 146 students

Skagit County: 10 presentations to 236 students

- EnviroScape watershed model presentations were also provided at the Mount Vernon High School Science Night in April (300+ attendees), STEM Science Night at Evergreen Elementary (250+ attendees), Dine and Discover (125 attendees), the Skagit River Salmon Festival (1,000+ attendees), Kids in Nature event (65 attendees).
- In addition, staff provided stormwater education/training with the EnviroScape Model for a group of 21 Girl Scouts earning their environmental badges (held on June 17th).
- 1,000 + National Association of Conservation District's "Where Does Your Water Shed?" activity booklets and bookmarks were distributed to local youth.



Figure 13 The Watershed EnviroScape model provides a “hands on” opportunity for local students to learn about stormwater and nonpoint source pollution.



Figure 14 Over 1,000 pet waste rack cards have been distributed throughout the county.

Task 2.4 Storm Water Educational Brochures and Fact Sheets.

- Pet Waste rack cards produced in 2016 were reprinted as we distributed over 1,000 over the year.
- The 5 Sustainable Landscaping Fact Sheets were all also reprinted as we were also running out of those (500 distributed).

- Staff continued to distribute the stormwater education posters ("Clean and Mighty Skagit"), the 5 Sustainable Landscaping Fact Sheets, Pet waste posters & yard signs, etc.
- Work was initiated to develop new fact sheets for the "Clean and Mighty Skagit" series.

Task 2.5 Workshops for Local Contractors and Businesses

A "Rainwater Harvesting" Workshop was coordinated and held on September 21st with **40 attendees**, including interested citizens, landscape designers, and agency representatives. CJ Huxford with Northwest Rain Solutions was the guest presenter. Participants had the opportunity to learn about system options (including raingardens, rain barrels, bioswales, etc.) and how to construct an effective rainwater collection system. The workshop was very well received. The event was also promoted as a "Skagit Water Weeks Event."



Figure 15 The Rainwater Harvesting Workshop held on Sept. 21st was well attended.

Task 2.6 PSSH Community Event Display Board

Staff hosted the Puget Sound Starts Here educational display and "Stormwater Scavenger Hunt" game at numerous local events in 2017 reaching over 9,000 attendees (Watershed Art and Discovery Day - 91 attendees, Fidalgo Bay Day - 400 attendees, Kid in Nature - 65 attendees, DASSH 5K - 118 attendees, Skagit Salmon Festival - 1,000 attendees, Dine and Discover - 120 attendees, Burlington Harvest Fest & Pumpkin Pitch - 4,500 attendees, Storming the Sound - 175 attendees, Seed Sale/Swap - 175 attendees, Alger Fun Raiser - 250 attendees, Sustainable Samish garden Tour - 300 attendees, Girl Scout Training - 21 attendees, Rainwater Harvesting Workshop - 40 attendees).

Participants who completed the Stormwater Scavenger Hunt received their Puget Sound Starts Here "Drain Ranger" badges.

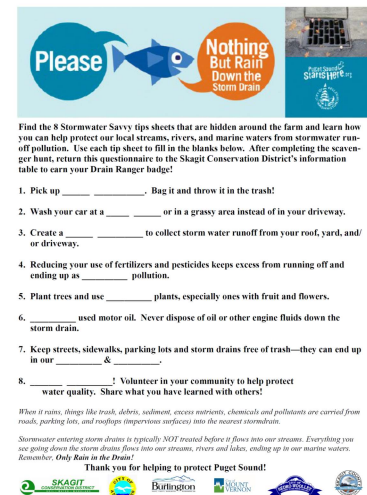


Figure 16 The Stormwater Scavenger Hunt was a popular activity at local events. Participants who found all the clues earned their Puget Sound Starts Here "Drain Ranger" badge.

Task 2.7 Produce Media Advertisements



The stormwater education media ad was published in 6 editions of the SV Herald (3 column x 8").

Figure 17 The stormwater education media ad was published in 6 editions of the SV Herald and Anacortes American.

OTHER STORMWATER RELATED EDUCATIONAL ACTIVITIES (funded by other sources):

Bay View GSI Demonstration Project

The Skagit Conservation District received grant funding through WA Dept.of Ecology's Terry Husseman Grant to construct a raingarden, and Compost Sock Terrace, and eradicate invasive blackberries and replant with natives at the Bay View United Methodist Church. The project was underway in 2017 and will be completed by May 2018. Educational signage, workshops and tours of the project will follow to promote LID in our community.

Clean and Green Car Wash Kits

The Clean and Green Car Wash kit program continued to be promoted throughout the community and each partnering jurisdiction continued to check out the kits to groups hosting car wash events.

Storm Water/Low Impact Development Presentations

In 2017 staff provided power point presentations on storm water and an introduction to low impact development and raingardens at 4 events reaching 184 residents.

Sustainable Landscape Garden Tours

Staff hosted 5 sustainable landscaping garden tours, including tour of native plant demonstration garden, naturescape garden at the Alger Hall, and the County Raingarden/LID project.

Arbor Day Trees

Provided over 500 native plant seedlings to classrooms and youth groups throughout Skagit County in celebration of Arbor Day in April.

Other (funded through other sources)

- Staff continued to participate on the Skagit EcoNet committee.
- Staff continues to serve on the Board for the Skagit Conservation Education Alliance (SCEA). SCEA kicked off the first annual "Skagit Water Weeks" celebration, which ran through the month of September 2017. Skagit Stream Team and Watershed Masters were both included as Water Weeks events this year. In addition, staff organized a Water Weeks Proclamation with the Skagit County Commissioners, which was held on Aug. 23rd, 2016.
- Staff attended scheduled meetings with local NPDES partners.
- Staff published several storm water related articles for the two 2017 publications of the Skagit Conservation News – distribution 4,600+ per publication. Topics included: Native plant landscaping, LID & Green Infrastructure, Storm water classroom presentations with the EnviroScape watershed model; storm drain marking events with local youth; promoted program and recognized participants of the Backyard Conservation Stewardship Short Course; Stream Team welcome and recognition, promoted program and recognized Watershed Masters.

EDUCATIONAL MATERIALS DISTRIBUTED:

- 45 Detention Pond Maintenance Handbooks distributed
- 65 Sustainable Landscape Handbooks distributed
- 15 Pet waste educational posters & outdoor signs distributed
- 125+ Low Impact Development: Coming to a Neighborhood Near You” brochures distributed.
- 250 Soil & Mulch: The Foundation of a Healthy Yard brochures distributed.
- 250 Planning & Planting a Sustainable Landscape brochures distributed.
- 250 Watering Wisely brochures distributed.
- 250 Think Twice Before Using Pesticides brochures distributed.
- 250 Natural Lawn Care brochures distributed.
- 25 Best Management Practices for Power Washing fact sheets distributed.
- 25 Best Management Practices for Mobile Carpet Cleaners distributed.
- 75 copies of the 2015/16 Skagit Stream Team Reports distributed (the report is also on the SCD and Padilla Bay Reserve websites).
- 1,250 “10 Things You Can Do to Prevent Stormwater Pollution” bookmarks distributed.
- 1,000+ NACD “Where Does Your Water Shed” activity booklets and bookmarks distributed.
- 350 Drain Ranger Badges distributed
- 100+ Storm Drain marking volunteer program promotional fliers distributed.
- 25 Clean and Green Car Wash Kit promotional fliers distributed.
- 125 “Home Tips for Healthy Streams” brochures distributed.
- 125 “10 Essentials Checklist for Rural Landowners” distributed.
- 65 “Turning the Tide on Toxics” publications distributed.
- 65 Backyard Conservation books distributed
- 150 Native plants of the Pacific Northwest distributed.

Numerous other related handouts are provided to participants of the WSM, Backyard Conservation Stewardship Short Course, Stream Team and participants of workshops & events.

ACTIVITIES PLANNED FOR 2018

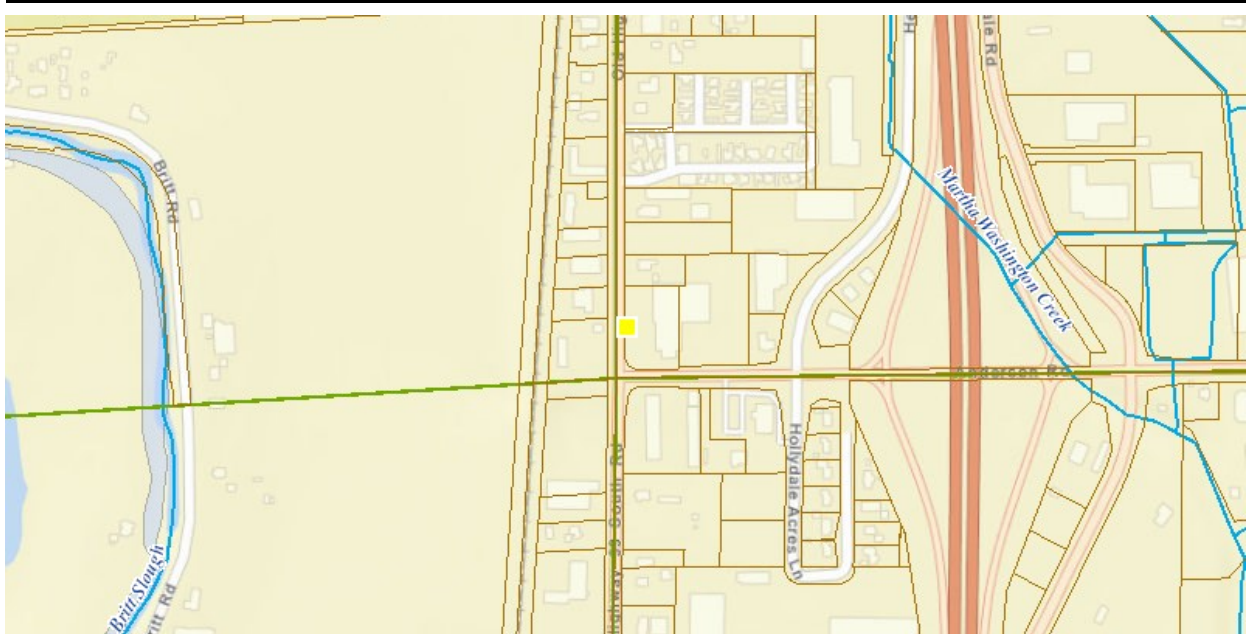
- The Backyard Conservation Stewardship Short Course will be conducted in the spring of 2018.
- SWMMT Workshop for on-site managers and construction crews to be scheduled.
- Stormwater Detention Pond Maintenance Workshop to be scheduled.
- Sustainable Landscaping Workshop to be scheduled in 2018.
- Storm drain labeling will continue.
- Skagit Stream Team program will continue with the annual training scheduled for September 2018.
- The Annual Stream Team Water Quality Report will be published.
- Stormwater education posters will be posted at key locations throughout the community, posted on websites, etc.
- Stormwater education media ads will be published in local media (and continue throughout the year)

- 2 new educational brochures/tip sheets will be published.
- Informational packets highlighting storm water and water quality education will once again be distributed to local schools.
- Staff will continue to provide presentations on storm water education with the watershed EnviroScape model to local school groups.
- Watershed Masters Volunteer training will be held in the fall of 2018.
- The storm water education display will be updated and hands on activities, including the "Stormwater Scavenger Hunt" game will be hosted at local community events (and will continue to enhance the display, promotional materials, and handouts).
- The SCD website will continue to be updated to include relevant storm water and LID information.
- News articles highlighting storm water education, LID practices, and volunteer opportunities will be included in each of the Skagit Conservation District's newsletters.
- Staff will continue to provide presentations to local groups on storm water and LID as requested.
- Stream Team data will be reviewed and will be used to target priority neighborhoods for follow-up education.
- Staff will continue to provide support to the Watershed Masters, backyard wildlife habitat volunteers, and Skagit Stream Team volunteers.
- All projects will be tracked, evaluation surveys conducted when appropriate, and reporting will continue.

Work Item Report

Illicit Discharge | IDDE - Non S/W Discharge | 7253975

211 Anderson Rd, Mount Vernon, Washington 98273



Collected By daniels@mountvernonwa.gov

Collected Date 3/22/2018 7:19:17 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/22/2018 7:19:18 PM

Status Complete

Priority 5

Asset Id 14827

Layer Name ST Nodes

Description On January 5th, 2017, steam coming out of one of the stormwater catch basins.

Comments On January 5th, we received an email from one of the Skagit County Environmental Health Specialists who noticed steam coming out of one of the catch basins north of Andersen Rd on Old Hwy 99 Rd during his morning commute. Blaine and Stella investigated the issue, but once they arrived, the steam had stopped. They found no evidence of an illicit connection. It was determined that the cold temperatures played a role in causing the steam. No actions necessary. - Daniel S

Illicit Discharge | IDDE - Non S/W Discharge | 7253975

211 Anderson Rd, Mount Vernon, Washington 98273

From: Britt Pfaff-Dunton [mailto:brittp@co.skagit.wa.us]
To: Spring, Stella

Sent: Thursday, January 05, 2017 2:31 PM
Subject: Steam from storm drain

Happy new year Stella!

Hope your holidays were good. I was driving northbound on Old Hwy 99 just after the intersection with Anderson Road today. On the east side of the road, there was steam coming out of one storm drain grate in front of the Central Moving, parcel P28723. It was the 1st grate north of the intersection. None of the other drains along that section of Old Hwy 99 had any visible water vapor coming out from them.

This is just an FYI in case there are any concerns in that area for potential cross connection issues with storm & sewer lines. This was about 8:00 this morning.

Thanks,

Britt Pfaff-Dunton
Environmental Health Specialist
Skagit County Department of Public Health
360-416-1500 (Health Dept.)
360-416-1562 (direct)

From: Chesterfield, Blaine
To: Schmidt, Daniel, **Cc:** Pritchard, Sherri

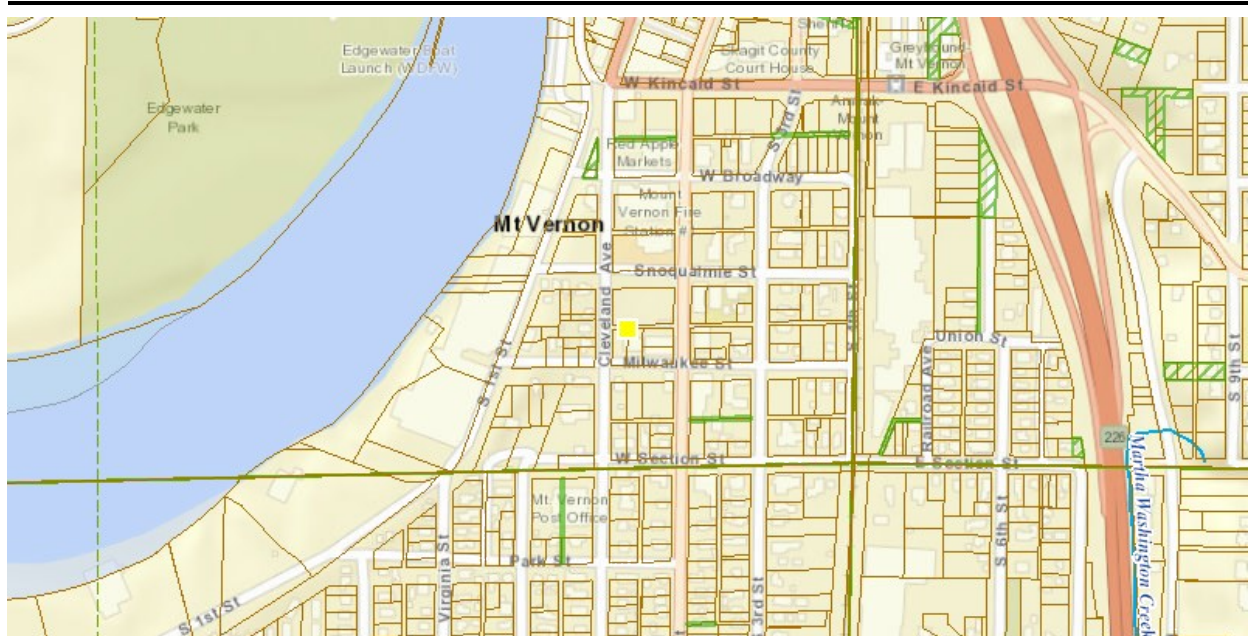
Sent: Tuesday, March 20, 2018 12:20 PM
Subject: FW: Steam from storm drain

Both Stella and I investigated this and there was not an issue.

Work Item Report

Illicit Discharge | IDDE - Discharge | 5110135

1013 Cleveland Ave, Mt Vernon, Washington 98273



Collected By [Stella.Spring](#)

Modified By daniels@mountvernonwa.gov

Status Complete

Asset Id _____

Layer Name _____

Description Gas leak from pick up truck.

Comments Less than 1 gal spill. Didn't reach the combined sewer system. Owner fixed leak. Contained and cleaned up by Streets Department.

Collected Date 2/17/2017 6:22:48 PM

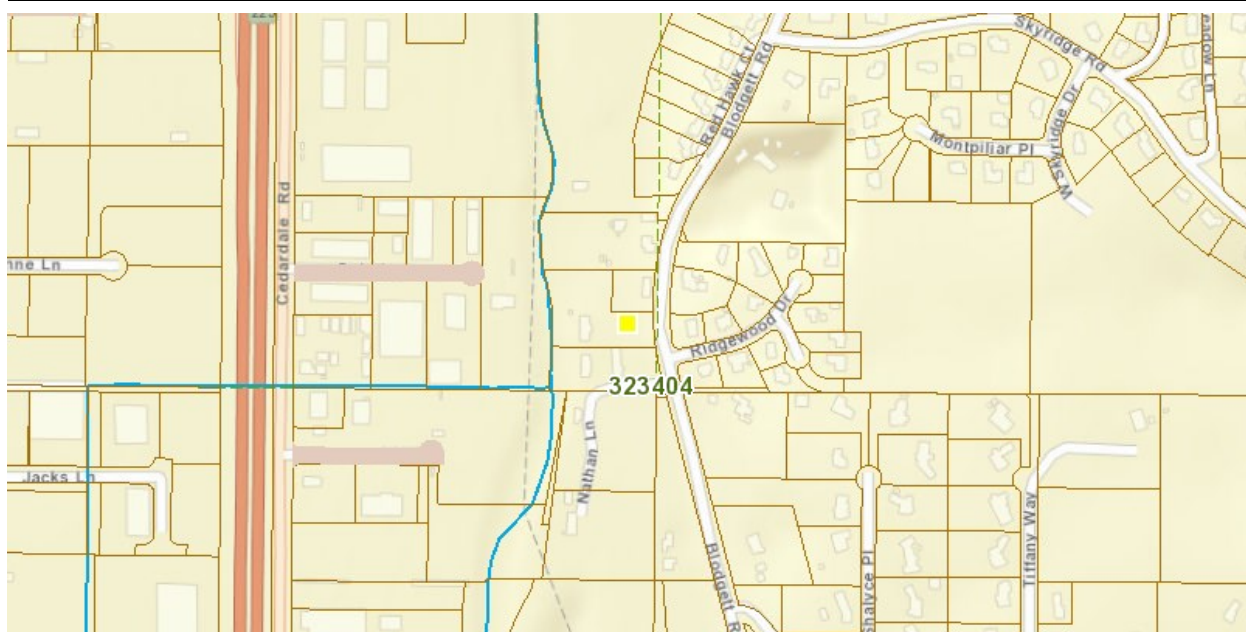
Modified Date 3/27/2018 11:53:51 AM

Priority 5

Work Item Report

Illicit Discharge | IDDE - Non S/W Discharge | 7253966

17450 Blodgett Rd, Mount Vernon, Washington 98274



Collected By daniels@mountvernonwa.gov

Collected Date 3/22/2018 7:00:41 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/23/2018 11:29:25 AM

Status Complete

Priority 5

Asset Id _____

Layer Name _____

Description On Feb. 22, 2017, goats were spotted roaming freely around Maddox Creek.

Comments Jason Quigley from Skagit County emailed with a picture showing where goats roaming freely by Maddox Creek nearby where he was working. He thought this had the potential for an illicit discharge through animal waste. No reports of high fecal counts on Maddox were known. Stella gave the property owner the "Streamside Savvy" pamphlet and recommended that they fence the farm animals away from the stream. In the end, the goats were removed from the property since the parcel was not zoned for agricultural use. This is not an NPDES violation since it did not enter into our MS4, but the city addressed the water quality concerns by providing education to the citizen and removing the animals. - Daniel S

Illicit Discharge | IDDE - Non S/W Discharge | 7253966

17450 Blodgett Rd, Mount Vernon, Washington 98274

From: Jason Quigley [mailto:jasonq@co.skagit.wa.us]<mailto:jasonq@co.skagit.wa.us>
To: Lee, Ken, **Cc:** Chesterfield, Blaine; Spring, Stella
Sent: Friday, February 24, 2017 11:24 AM
Subject: goats with access to surface waters

Mr. Lee,

I was over working just east of this address on Wednesday and saw these goats running around. As you can see in the picture they had unrestricted access to Maddox Creek and there is a clear path for an illicit discharge (animal waste) to enter Maddox Creek.

Thank you,
Jason

Jason Quigley
Environmental Resources Technician II
Skagit County Public Works / 360-416-1463 (desk) / 360-630-0339 (cell)

From: Spring, Stella
To: Lee, Ken, **Cc:** Jason Quigley; Chesterfield, Blaine; kristi@skagitcd.org<mailto:kristi@skagitcd.org>; john@skagitcd.org<mailto:john@skagitcd.org>; jeff@skagitcd.org<mailto:jeff@skagitcd.org>
Sent: Friday, February 24, 2017 12:06 PM
Subject: FW: goats with access to surface waters

Hi Ken,

Let me know if you'd like me to try to make contact with the property owner or do a site visit. The homeowner can contact the Skagit Conservation District for technical assistance. John Schuh and Jeff Frazier are the livestock technicians (I'm cc-ing them as a heads up). Maybe we should have some of their cards on hand. I'll see if I can pick some up.

Here's their info:
Skagit Conservation District
2021 E. College Way, Suite 203
Mount Vernon, WA 98273-2373
Phone: 360-428-4313

Hope you had a great weekend,

From: Jason Quigley [mailto:jasonq@co.skagit.wa.us]
To: Spring, Stella; Lee, Ken, **Cc:** Chesterfield, Blaine; kristi@skagitcd.org<mailto:kristi@skagitcd.org>; john@skagitcd.org<mailto:john@skagitcd.org>; jeff@skagitcd.org<mailto:jeff@skagitcd.org>
Sent: Friday, February 24, 2017 12:21 PM
Subject: RE: goats with access to surface waters

Thank you Stella. I thought about mentioning this yesterday to you and your co-worker but time got away.

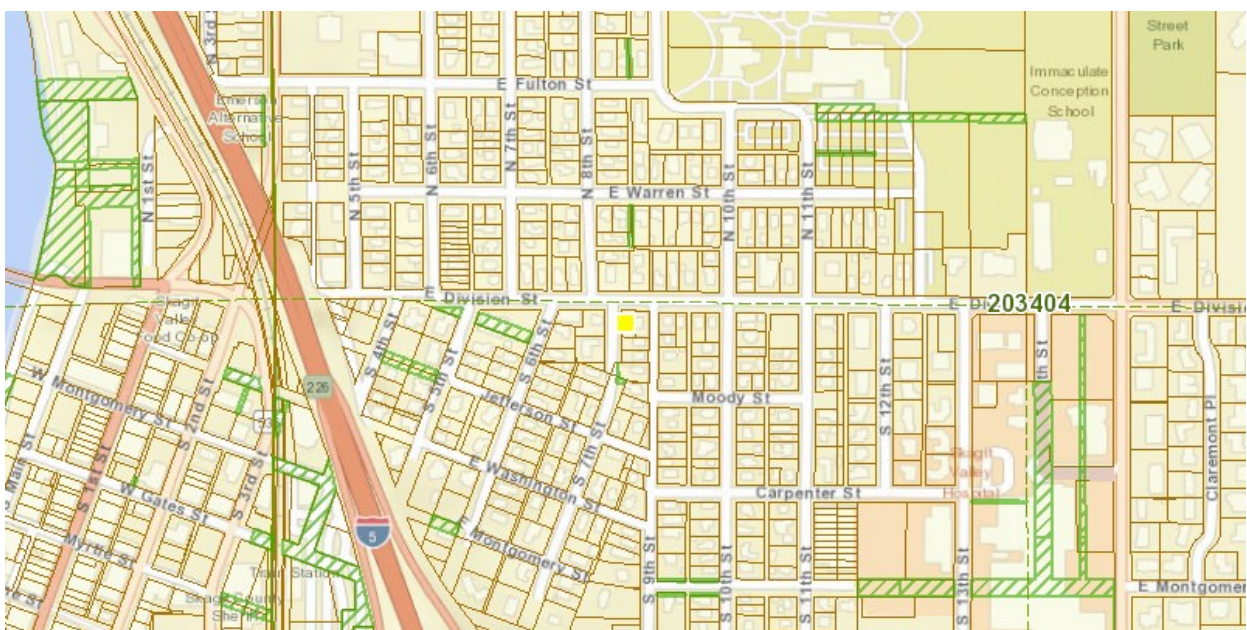
If you look close at the picture there are some fence posts that made me think they have had fencing up in the past or were previously working on something to have somewhat of a setback from the stream, but it definitely was not up last Wednesday or presumably anytime recent.

To prevent pollution, bank erosion, and help fish, this would be a good candidate for some riparian vegetation and fencing.

Work Item Report

Illicit Discharge | IDDE - Discharge | 7258952

502 E Division St, Mount Vernon, Washington 98274



Collected By daniels@mountvernonwa.gov

Collected Date 3/23/2018 1:44:04 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/23/2018 1:55:49 PM

Status Complete

Priority 1

Asset Id _____

Layer Name _____

Description On Feb 22, 2017, the city received a complaint about a citizen parking their truck on their yard and dragging mud and sediment into the right-of-way.

Comments The citizen believed that the trucks were causing stormwater runoff to be saturated in mud and spreading across the roadway. The homeowner was educated and informed that bringing excess sediment into the right-of-way is an illicit discharge, and it can lead to water quality issues down stream and clog up the city's drainage system. Ken (Code Enforcement) confirmed that he had the citizen install a gravel parking area for his truck. Subsequent site visits have noted a significant reduction in silty-runoff. - Daniel S

Illicit Discharge | IDDE - Discharge | 7258952

502 E Division St, Mount Vernon, Washington 98274

From: Scott Pratschner [mailto:ScottP@nwcleanairwa.gov]
To: Jewett, Krista

Sent: Wednesday, February 22, 2017 3:52 PM
Subject: possible code violation

Hi Krista,

A neighbor of mine has been parking big trucks on his lawn and side of house along 7th St, which has dug deep muddy ruts into the public right-of-way. There's muddy runoff all over the road now. I'm hoping this is a code violation, as it's ugly as sin, but also a stormwater problem. Contact form attached. Thanks!

Scott Pratschner
Inspector II
Northwest Clean Air Agency
360-428-1617 x230
www.nwcleanairwa.gov<<http://www.nwcleanairwa.gov/>>
(Note the new website. Please update your bookmarks!)

From: Spring, Stella
To: Jewett, Krista, **Cc:** Chesterfield, Blaine; Pritchard, Sherri; Lee, Ken

Sent: Thursday, February 23, 2017 7:26 AM
Subject: FW: possible code violation

Hi Krista,

My apologies, I was out of office yesterday and should have updated my email to show it. I am leaving early this morning for a conference, so I'm cc-ing Blaine as well.

I can do some follow up tomorrow if needed. It looks like Ken is out of office as well. I'll check in when I get back to find out how I can help.

-Stella

From: Jewett, Krista
To: Pritchard, Sherri; Spring, Stella, **Cc:** Lee, Ken

Sent: Wednesday, February 22, 2017 4:03 PM
Subject: FW: possible code violation

Hey all...

Could you take a look at the email below and the attached form?

Stella.....Would your department follow up on this regarding the muddy run off?

Ken...can you check into the trucks parked on the lawn?

Krista Jewett
Permit Tech-Development Services
City of Mount Vernon
360-336-6214



CITIZEN CONTACT

Location of Violation:				Date:	
502 E. Division St, Mount Vernon (along 7th St)				2/22/17	
Reporting Citizens Name:					
Scott Pratschner					
Reporting Citizens Address:		Mount Vernon		WA	
1600 South Second St		City		State	
				98274	
				Zip Code	
Reporting Citizens Telephone Number:			Reporting Citizens Email Address:		
360-224-0472			scottp@nwcleanairwa.gov		
Description of Violation/Issue/Concern:					
<p>New resident at 502 E. Division has dug deep muddy ruts all along the side of their house and public right-of-way along 7th from parking large trucks on their yard on the side of their house. These is causing stormwater runoff to be saturated in mud that is spreading across the roadway during rain. Parking on the lawn has also removed large amounts of grass, exposing more mud. Please investigate.</p>					
FOR STAFF USE BELOW:					
Received By:			Received On:		
Parcel Number:			Case Number:		
Departmental Notes:					

Work Item Report

Illicit Discharge | IDDE - Discharge | 5154259

3656 E College Way, Mt Vernon, Washington 98273



Collected By Stella.Spring

Collected Date 3/1/2017 6:33:03 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/27/2018 11:38:26 AM

Status Complete

Priority 5

Asset Id _____

Layer Name _____

Description Ken Lee and Emily Van Hartog report continuing non-compliance problem with poultry that is also impacting stormwater. Ken Lee requests water quality sampling

Comments I called Kristi Carpenter. The Stream Team is scheduled to take samples (turbidity and fecal) tomorrow at a station across the street. Rick Haley recommends taking samples on Friday after the storm. May take a turbidity reading on Friday nearer to the site.

Per Ken Lee (3/26/2018 @ 5:22pm), the chicken pen and the animals themselves were moved away from the creek. The fecal sample and turbidity levels came back within the acceptable range. - Daniel S

ERTS Number _____

Work Item Report

Illicit Discharge | IDDE - Dumping | 5181805

2617 Rainbolt Pl, Mt Vernon, Washington 98274



Collected By Stella.Spring

Collected Date 3/8/2017 5:49:16 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/27/2018 12:42:12 PM

Status Complete

Priority 5

Asset Id _____

Layer Name _____

Description Contacted Ken Lee regarding car seats dumped in/near Maddox Creek. while in the field.

Sent: Wednesday, March 08, 2017 1:44 PM

Subject: Car Seats

I was able to contact the property owners at 2617 Rainbolt Pl about the seats. They have just bought and moved into the house and stated the previous owner had left a lot of old car parts and other debris on the property. The seats were there when they moved in but she stated she would [clean up the site and] remove them.

Ken

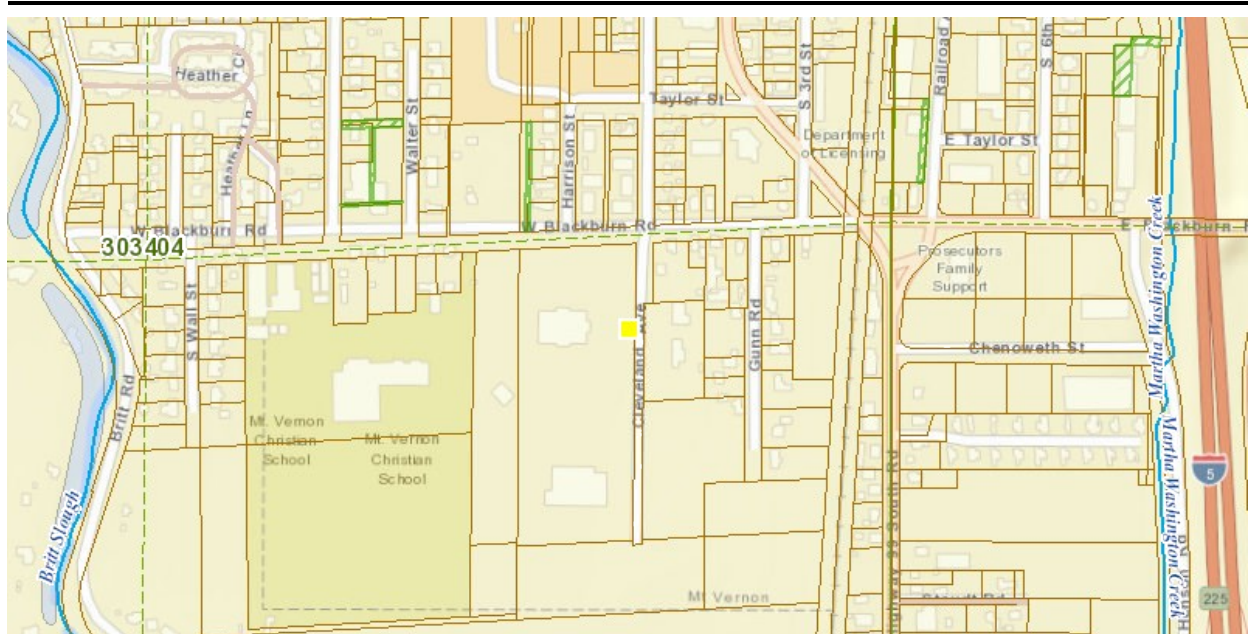
Comments _____

ERTS Number _____

Work Item Report

Illicit Discharge | IDDE - Discharge | 7253894

400 W Blackburn Rd, Mount Vernon, Washington 98273



Collected By daniels@mountvernonwa.gov

Collected Date 3/22/2018 5:39:51 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/22/2018 5:40:49 PM

Status Complete

Priority 1

Asset Id _____

Layer Name _____

Description On March 24th, 2017, MVSD bus station on Cleveland Ave was noted as discharging water from washing the buses.

Comments This was investigated over a week as Stella waited for the maintenance supervisor with Mount Vernon School District to produce the drawings of the site plan for the bus barn. It showed that the system was tied into the sewer, so all water from washing buses in the station was sent to the waste water treatment plant. However, the maintenance supervisor noted that there was the potential for sending wash water into the storm system only when the drivers had begun lining up multiple buses. After talking with the maintenance supervisor about this behavior, he assured us that he would educate his drivers not to wash buses outside of the designated washing area that sends water down to the sewer line, and he said he would also post signs around the building. They were going to look into a way to contain water outside the station and have it enter the mainline before a separation tank to allow them to wash outside in the future. - Daniel S

ERTS Number 671717

Illicit Discharge | IDDE - Discharge | 7253894

400 W Blackburn Rd, Mount Vernon, Washington 98273

From: Kicken, Yvonne (ECY) [mailto:YKIC461@ECY.WA.GOV]
To: Maginnis, Christina (ECY); Chesterfield, Blaine; MVEngineering; Spring, Stella

Sent: Friday, March 24, 2017 11:29 AM
Subject: You've got ERTS! 671717
Importance: High

The incident number 671717 has been referred to you. Please follow up.

Note: The initial report information is attached in PDF format. You need to have Adobe Acrobat Reader to read the information.

From: Spring, Stella
To: Kicken, Yvonne, **Cc:** Maginnis, Christina; Chesterfield, Blaine, MVEngineering

Sent: Friday, March 31, 2017 4:00 PM
Subject: RE: You've got ERTS! 671717

Hi Yvonne and Christina,
Chris Johnson, the new Maintenance Supervisor of the Mount Vernon School District, got back to me with drawings. Their system is tied to sewer, however, on investigation Chris found that when the drivers had more than a few buses lined up, they were washing outside the station, potentially sending wash water into the storm system. Chris is following up by educating the drivers not to wash the buses outside the station and by posting signs at the building. They also plan to look into a way to contain water outside and have it enter the mainline before the separation tank. This might facilitate their operation and allow them to wash outside in the future.

Let me know if you have any questions.

From: Maginnis, Christina (ECY)
To: Spring, Stella, Kicken, Yvonne (ECY), **Cc:** Chesterfield, Blaine

Sent: Tuesday, April 04, 2017 9:16 AM
Subject: RE: You've got ERTS! 671717

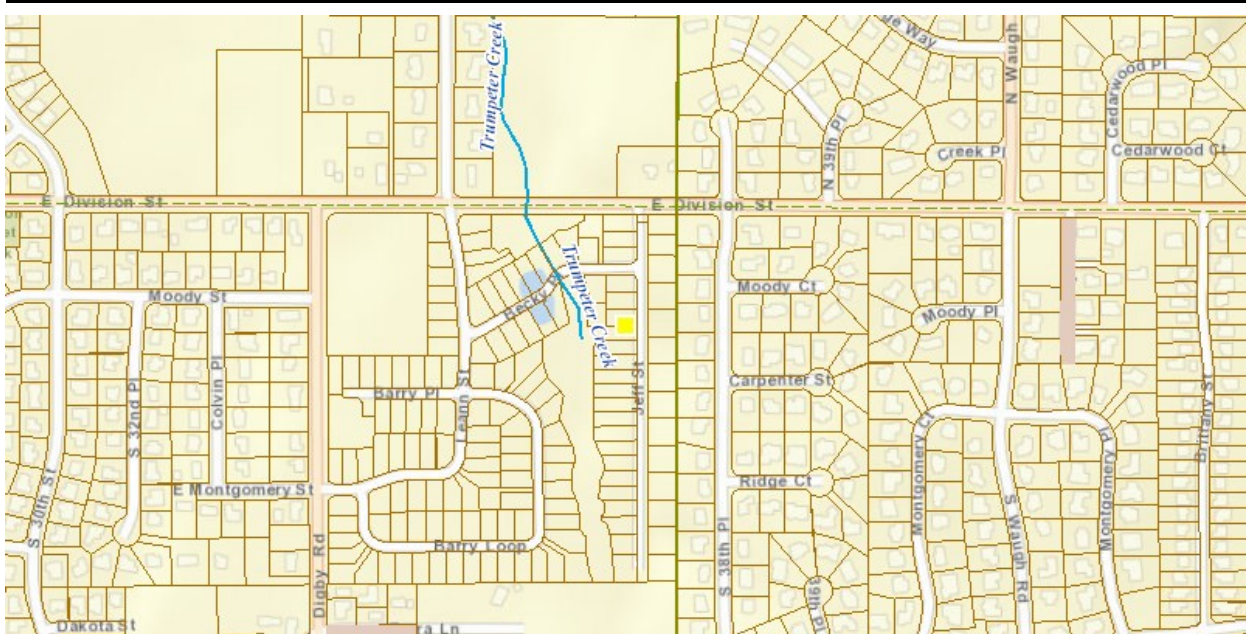
Hi Stella,
Thank you for the follow up on this ERTS.

Christina Maginnis, Municipal Stormwater Specialist Department of Ecology, Water Quality Program
1440 10th St., Suite 102
Bellingham, WA 98225
360-715-5212

Work Item Report

Illicit Discharge | IDDE - Discharge | 5339598

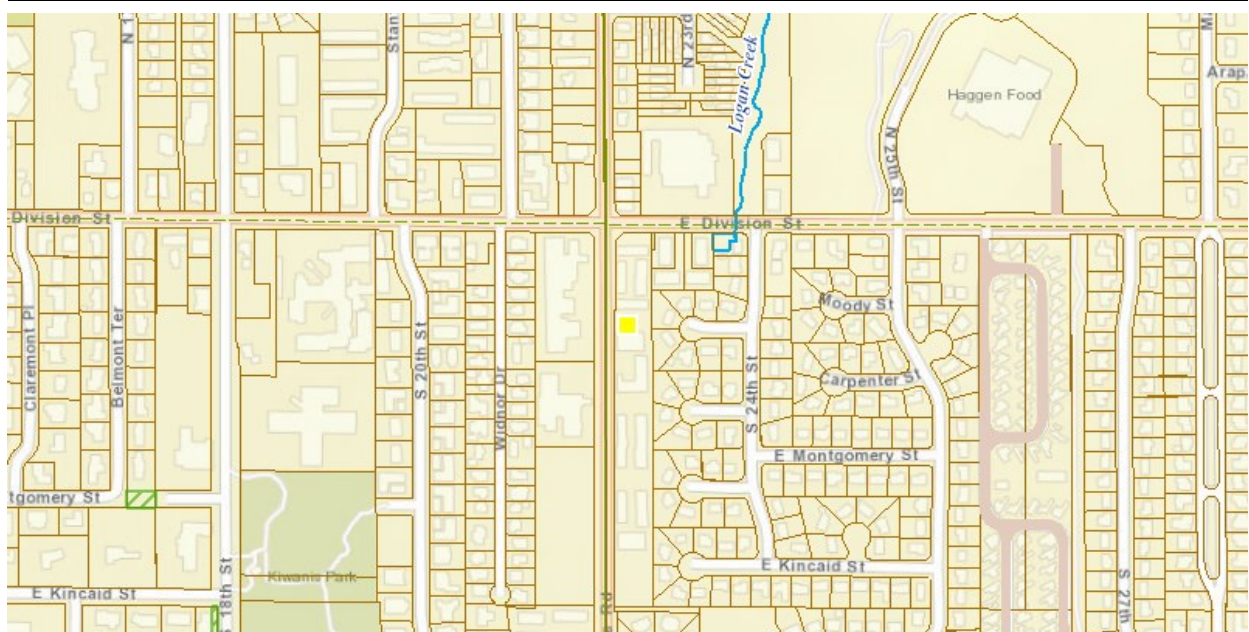
218 Jeff St, Mt Vernon, Washington 98274



Work Item Report

Illicit Discharge | IDDE - Dumping | 7253842

2301 Moody St, Mount Vernon, Washington 98274



Collected By daniels@mountvernonwa.gov

Modified By daniels@mountvernonwa.gov

Status Complete

Asset Id _____

Layer Name _____

Description On May 1st, 2017, a supposed carpet cleaning van was dumping chemicals down a storm drain at Arbor Park Apartments.

Comments A citizen called to inform that they witnessed a carpet cleaning van dumping chemicals at the Arbor Park Apartments on Laventure Rd. City employees responded within about half an hour, but the van was no longer there. They noticed that the apartment complex had private catch basins in their parking lots, and it was one or two of these that had a slight soapy smell and very light greenish residue around them. It was determined that there was very little to clean up as it had been diluted and washed downstream due to the rainy weather they experienced that day. Since there was nothing in the system that we could detect it was determined not to call the Collections Department to the site. There was no evidence of any soap or green in the City stormwater system. The employees talked with the manager of the apartment complex, who told them that he didn't have any carpet cleaning scheduled or that he knew of any residents getting any carpet cleaning done. The manager took some educational stormwater brochures to distribute to his residents. - Daniel S

Collected Date 3/22/2018 4:56:04 PM

Modified Date 3/22/2018 4:56:35 PM

Priority 1

Illicit Discharge | IDDE - Dumping | 7253842

2301 Moody St, Mount Vernon, Washington 98274

From: Morrison, Morgan
To: Bell, E; Chesterfield, B; Christen, D; Gilbert, D; Love, M; Myers, M; Pritchard, S; Spring, S

Sent: Monday, May 01, 2017 12:45 PM
Subject: Chemical Dumping
Importance: High

I received a call a few minutes ago from a concerned citizen reporting a carpet cleaning company dumping chemicals into our storm drain at Arbor Park Apartments on LaVenture Road.

From: Spring, Stella
To: Lee, Ken, **Cc:** Morrison, Morgan; Bell, Esco; Chesterfield, Blaine; Christen, Darin; Gilbert, Dean; Love, Mikael; Myers, Michele; Pritchard, Sherri
Sent: Monday, May 01, 2017 1:13 PM
Subject: RE: Chemical Dumping

Hi Morgan,
I can check on this. I'm also forwarding it to Ken Lee.

From: Spring, Stella
To: Lee, Ken; Morrison, Morgan; Bell, Esco; Chesterfield, Blaine; Christen, Darin; Gilbert, Dean; Love, Mikael; Myers, Michele; Pritchard, Sherri
Sent: Monday, May 01, 2017 2:35 PM
Subject: RE: Chemical Dumping

Hi Ken,
Arbor Park has several parking lots with a private storm system. There was a slight soapy smell and a greenish residue near a catch basin in the 2nd lot south of E Division next to the Arbor Park office. The 2 private catch basins in the lot had a residual greenish substance, but it looked like there was very little or most of it had washed downstream. It wasn't enough to warrant calling Collections for cleanup. I met with Floyd Weathersbee, the new manager at Arbor Park. He didn't have any carpet cleaning scheduled, nor did he know of any resident carpet cleaning activity, however the secretary noted there had been an unmarked white van in the lot earlier. Mr. Weathersbee took stormwater brochures to distribute at the front office.

Sherri,
I will enter the incident in Mobile311 and close it out.

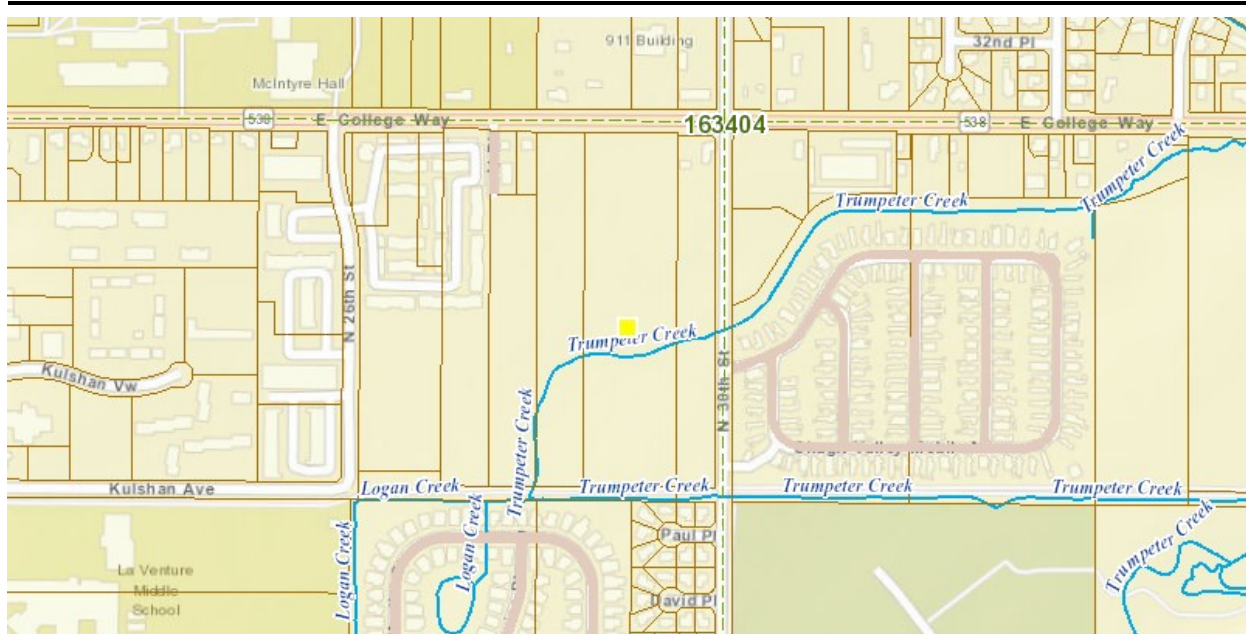
From: Chesterfield, Blaine
To: Spring, Stella, **Cc:** Lee, Ken; Morrison, Morgan; Myers, Michele; Pritchard, Sherri
Sent: Monday, May 01, 2017 2:56 PM
Subject: RE: Chemical Dumping

Whoever is putting this in the Mobile311 file please note: That it was a wet and rainy day and that even though the City responded within half of an hour whatever was there had likely been diluted and flushed out of the system already.

Work Item Report

Illicit Discharge | IDDE - Non S/W Discharge | 7243443

2858 E College Way, Mount Vernon, Washington 98273



Collected By daniels@mountvernonwa.gov

Collected Date 3/21/2018 7:55:58 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/21/2018 7:58:40 PM

Status Complete

Priority 5

Asset Id _____

Layer Name _____

Description Reports of high fecal counts on a tributary of Trumpeter Creek and of a homeless encampment upstream.

Comments On May 16th, 2017 we received an ERTS for high fecal counts on a tributary of Trumpeter Creek. There was also a report of a homeless camp upstream from where the sample had been taken.

That afternoon, Tom Wenzl from Parks and Ken Lee from Code Enforcement went out to investigate. They located the camp north of Kulshan Trail and west of 30th St, and they found open sewage pits and scattered human waste in the area. They also looked at an area of Thunderbird Creek that had the potential for an encampment, but they only found a couple of animal enclosures housing some geese.

The incident does not involve the MS4, as it is on private property with high potential for input to the creek. The parties involved agreed that more sampling should be undertaken to definitively say where the high fecal count had originated from, but that the city will attempt to mitigate the problem by enforcement, removal of the trespassers, and may be involved in some cleanup. - Daniel S

ERTS Number 673088

Illicit Discharge | IDDE - Non S/W Discharge | 7243443

2858 E College Way, Mount Vernon, Washington 98273

From: Kicken, Yvonne (ECY) [mailto:YKIC461@ECY.WA.GOV]

Sent: Tuesday, May 16, 2017 8:20 AM

To: DeVoe, Danielle (ECY); Blaine Chesterfield; Mt Vernon Engineering; Stella Spring; Corrina L. Marote; Rick Haley

Cc: Wenzl, Tom; Greg Geleynse; Chesterfield, Blaine; Michael See; Rick Haley **Subject:** You've got ERTS! 673088 - Homeless Camp and High Fec on Trumpeter **Importance:** High

The incident number 673088 has been referred to you. Please follow up.

Note: The initial report information is attached in PDF format. You need to have Adobe Acrobat Reader to read the information.

From: Spring, Stella

Sent: Tuesday, May 16, 2017 9:28 AM

To: Kicken, Yvonne (ECY); DeVoe, Danielle (ECY); Chesterfield, Blaine; MVengineering; Marote, Corrina (DOHi) <corrinam@co.skagit.wa.us>;

Cc: Wenzl, Tom; Greg Geleynse; Chesterfield, Blaine; Michael See; Rick Haley

Subject: RE: You've got ERTS! 673088 - Homeless Camp and High Fec on Trumpeter

Hi Yvonne,

My report was hurried yesterday so I'd like to clarify a few things.

The incident does not involve the MS4. It is waste on private property with a high potential for input to the creek.

It was reported to me by Tom Wenzl of City of Mount Vernon Parks and Rec.

Rick Haley of Skagit County had reported high fecal counts on two branches of the Trumpeter back in April.

There isn't direct evidence of fecal waste input to the Trumpeter, but the site has a number of sewage pits within 50 to 100 feet of the creek and there was other human waste found scattered on site, so there is a high potential for input.

The city will attempt to mitigate the problem by enforcement and removal of the trespassers and may be involved in some of the cleanup*, however, the city is not the responsible party in relation to this property.

There is also a report of an illicit connection. There was a pvc pipe found on site to the creek. It is unknown at this time if this has been used to convey something into or out of the stream.

* Tom reported that cleanup usually involves removal of refuse that can be hauled out on foot. They can remove buckets of waste, but the open pits are not something the city crew can clean up.

Let me know if you have any questions.

From: Corrina L. Marote

Sent: Tuesday, May 16, 2017 9:47 AM

To: Kicken, Yvonne (ECY); DeVoe, Danielle (ECY); Blaine Chesterfield; Mt Vernon Engineering; Stella Spring; Rick Haley

Cc: Wenzl, Tom; Greg Geleynse; Chesterfield, Blaine; Michael See; Rick Haley

Subject: RE: You've got ERTS! 673088 - Homeless Camp and High Fec on Trumpeter

Hi All,

Fecal matter that doesn't involve a septic system is actually a solid waste problem. I've forwarded the complaint to Matt Kaufman in our department for follow up.

Corrina Marote, MS, REHS

Environmental Health Specialist II / Skagit County Department of Public Health

1800 Continental Place, Mount Vernon, WA 98273

Telephone: (360) 416-1563 / Cell: (360) 399-0136 / FAX: (360) 416-1501 /

<http://www.skagitcounty.net/>

From: DeVoe, Danielle (ECY) [mailto:ddev461@ECY.WA.GOV]

Sent: Tuesday, May 16, 2017 9:58 AM

To: Marote, Corrina (DOHi); Kicken, Yvonne (ECY); Chesterfield, Blaine; MVengineering; Spring, Stella; Rick Haley

Cc: Wenzl, Tom; Greg Geleynse; Chesterfield, Blaine; Michael See; Rick Haley

Subject: RE: You've got ERTS! 673088 - Homeless Camp and High Fec on Trumpeter

Thank you Corrina,

After Matt has a chance to check things out, could you please update us on what He determines to be the next steps?

Thank you!

Danielle DeVoe

Water Cleanup (TMDL) Lead / Skagit, Samish & Kitsap Watersheds

Department of Ecology, NWRO / (425) 649-7036 office

From: Spring, Stella

Sent: Tuesday, May 16, 2017 10:17 AM

To: DeVoe, Danielle (ECY); Marote, Corrina (DOHi); Kicken, Yvonne (ECY); Chesterfield, Blaine; MVengineering; Rick Haley

Cc: Wenzl, Tom; Greg Geleynse; Chesterfield, Blaine; Michael See; Rick Haley

Subject: RE: You've got ERTS! 673088 - Homeless Camp and High Fec on Trumpeter

I called Matt and gave him Tom Wenzl's number. At this point Tom is the best person to reach for a site visit, since it is private property. Tom is going out to the site today with the city code enforcement officer, Ken Lee, to further inspect and assess the situation. Tom Wenzl: 360 661-2651

From: Wenzl, Tom

Sent: Tuesday, May 16, 2017 2:13 PM

To: Rick Haley

Subject: Question

So I want to ask this outside the rest of the group so that I don't sound like an idiot.

The map/overheads you originally sent shows site 14 having a 1100 CF count. According to what I'm seeing, that is the Thunderbird Creek. Then there is a reading at Trump (no political influence, although it makes groundwork for a good joke) which was at 540. If I'm reading the map correctly, we don't actually have a reading for the Trumpeter Creek before it joins with Thunderbird, unless one of the other sites listed is a one of them. So if I'm correct, we can't actually say how much CF could be coming from this transient encampment we found.

So after looking at the overheads, where Thunderbird crosses College Way, looked like a great spot for an encampment. I drove out there and trudded around and found there is nothing. However, a couple residences up stream have what looks like some animal enclosures. One I found has a couple of geese, and I didn't see any animals in the other.

Would it be possible to get some samples from other locations to try and narrow down the source?

I would really like to see a sample taken of the Trumpeter Creek at N 30th. This would be just a couple hundred feet down stream of the encampments we located. And on Thunderbird, I'd suggest one at Seneca Dr which is about 1,000 feet upstream from College Way. I did notice when I was at College Way, on the south side of the street, that the stream is backed up (not covering) around one of our sewer man hole covers... So maybe it's a source for that spike?

From: Rick Haley
To: Wenzl, Tom, **Cc:** Spring, Stella; Michael See; Chesterfield, Blaine; Heather A. Bickford

Sent: Tuesday, May 16, 2017 2:23 PM
Subject: RE: Question

Hi Tom – I would see those extra samples you refer to, which are definitely warranted, as being part of the city's program. We sample at College Way on Thunderbird because it's one of our 40 sites county-wide. The Land Trust asked us to start sampling on their property on Trumpeter Creek as part of their planned creek restoration. So you're right, the high number at College Way Site 14 does not reflect the homeless situation we are talking about at the moment – I was just letting Stella know that we got a hit there (again) as there are some known/suspected sites upstream from there in the city. I appreciate your observation of the manhole cover, maybe you could show me on a map where that is? That could certainly explain this hit but we get high ones at site 14 during dry weather as well.

So again, I see your N 30th street and Seneca samples as being something the city might want to take care of.

Rick Haley
Water Quality Analyst / Skagit County Public Works
1800 Continental Place, Mount Vernon, WA 98273
360-416-1457 / 360-416-1400 (Receptionist) / rickh@co.skagit.wa.us<mailto:rickh@co.skagit.wa.us>

From: Spring, Stella
To: Rick Haley, Wenzl, Tom, **Cc:** Michael See; Chesterfield, Blaine; Heather A. Bickford; kristi@skagitcd.org; Schorno, David
Sent: Tuesday, May 16, 2017 3:33 PM
Subject: RE: Question

Hi Tom and Rick,
I talked with Kristi Carpenter of the Skagit Conservation District today and there's a site closer and downstream of the homeless camp the Stream Team samples regularly and they haven't had high counts there. I'm cc-ing Kristi and Dave Schorno of the lab at the city waste water treatment plant.

Dave,
Tom Wenzl is dealing with a homeless camp with open sewage pits and scattered waste N of the Kulshan trail and W of N 30th. He's requesting sampling just E of the site. There's another area off College Way the city may want to sample in relation to high fecal counts on another branch of the Trumpeter.

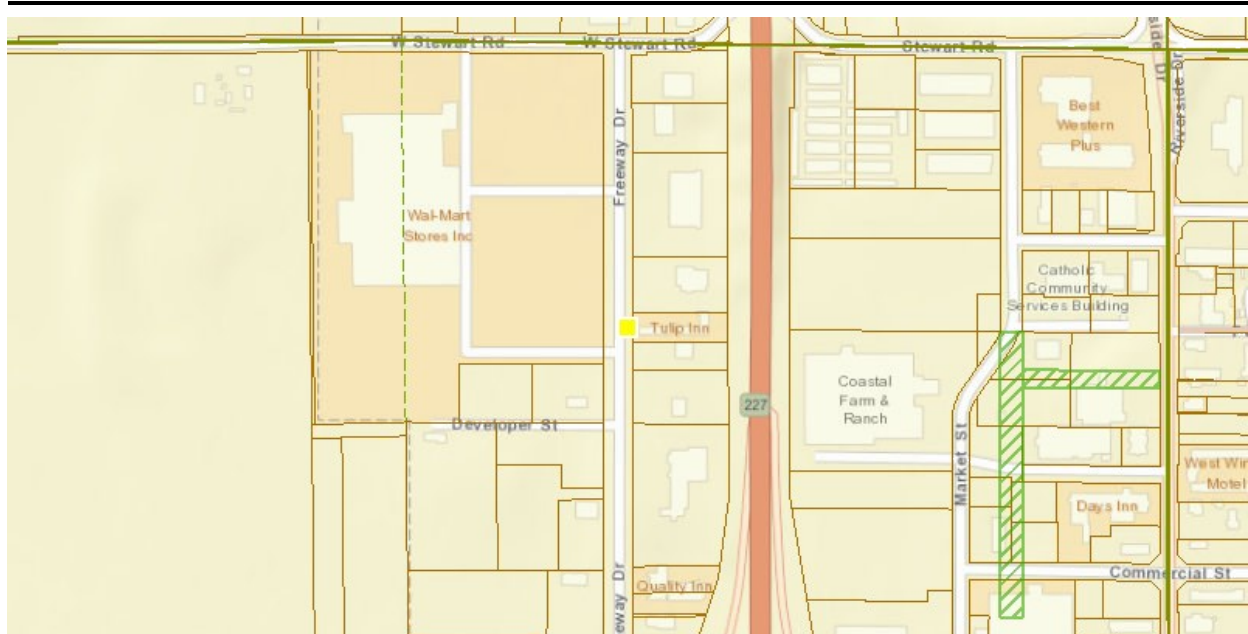
If the Stream Team has time to take extra samples would the WWTP be able to run 2 more tests?

Kristi,
What is the Trumpeter Stream Team schedule?

Work Item Report

Illicit Discharge | IDDE - Dumping | 5802761

2200 Freeway Dr, Mount Vernon, Washington 98273



Collected By [Sherri.Pritchard](#)

Collected Date 7/14/2017 7:02:20 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/21/2018 3:23:45 PM

Status Complete

Priority 1

Asset Id _____

Layer Name _____

Description Jeanette Case called to report that while walking along Freeway Drive, she noticed what looked like plaster or paint had been dumped into the storm drain in front of Tulip Inn.

Comments 7/17/2017 per Ken Scott - small amount of water soluble plaster found in ditch.

7/17/17: Added photo showing plaster on CB grate. Can we clean off or replace the CB grate? - DS

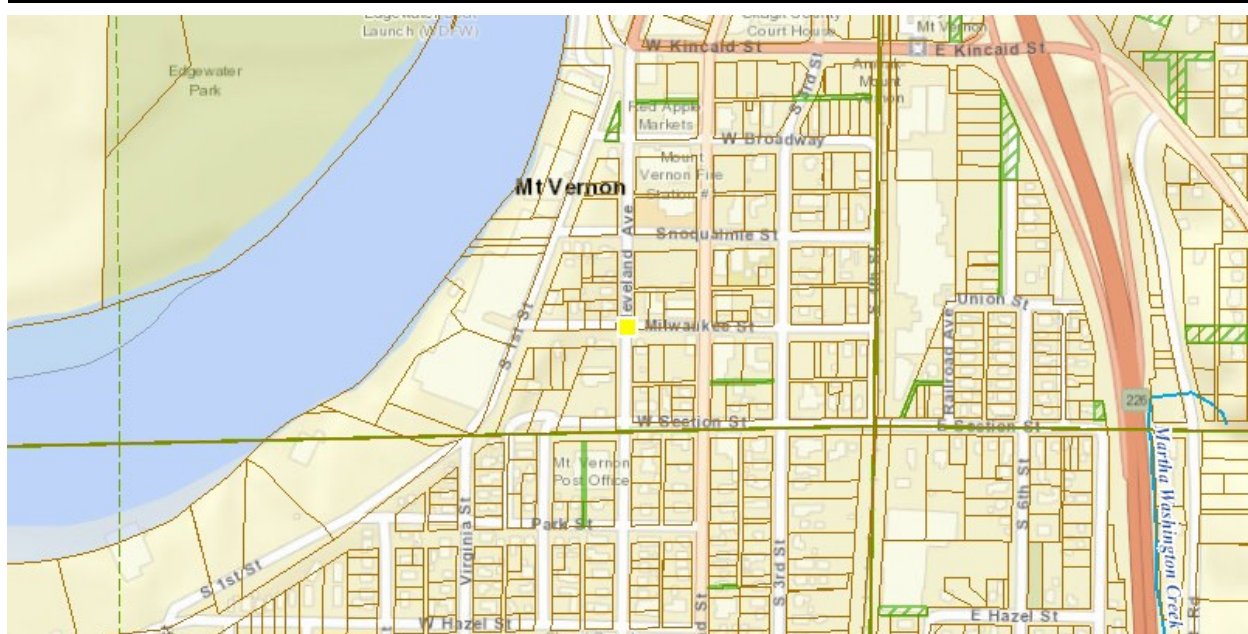
The grate was not replaced since it did not impact our MS4 as the material would not come off during a rain event. - DS



Work Item Report

Illicit Discharge | IDDE - Discharge | 5923044

Cleveland & Milwaukee St, Mount Vernon, Washington 98273



Collected By Sherri.Pritchard

Collected Date 8/4/2017 7:33:01 PM

Modified By Sherri.Pritchard

Modified Date 8/4/2017 7:33:02 PM

Status Complete

Priority 1

Asset Id _____

Layer Name _____

Description 8/2/2017 Email from Daniel Schmidt:

“Call from Rick Van Pelt at WWTP indicating excess silty water was entering into the plant. Skagit PUD was pumping dirty water from worksite at 1st & Milwaukee as they replaced some of their pipes. Blaine, Nick, Dean, and I went out to talk to them and pumping ceased. We told them that they should pump in to a grassy area or a pre-dug hole to allow the water to settle into the ground. They intimated that a sock at the end of the hose and in the CB would filter out the silt and allow clean water to enter the stormwater system. We brought out a copy of the plans and told them that under DISTRICT STANDARD GENERAL NOTES article 18 states, “do not flush or allow chlorinated water to drain into any creek, wetland, or catch basin.” Need to contact Pete at Skagit PUD for follow up conversation.”

Comments 8/2/2017 email from Blaine Chesterfield to Ana Chesterfield:

I just spoke with Pete VanAssche from PUD at 12:20 pm about the silty water pumping this morning. He said that they will be looking into this as they usually pump the water out of the line clean and dechlorinate it before putting it into a sewer or storm drain.

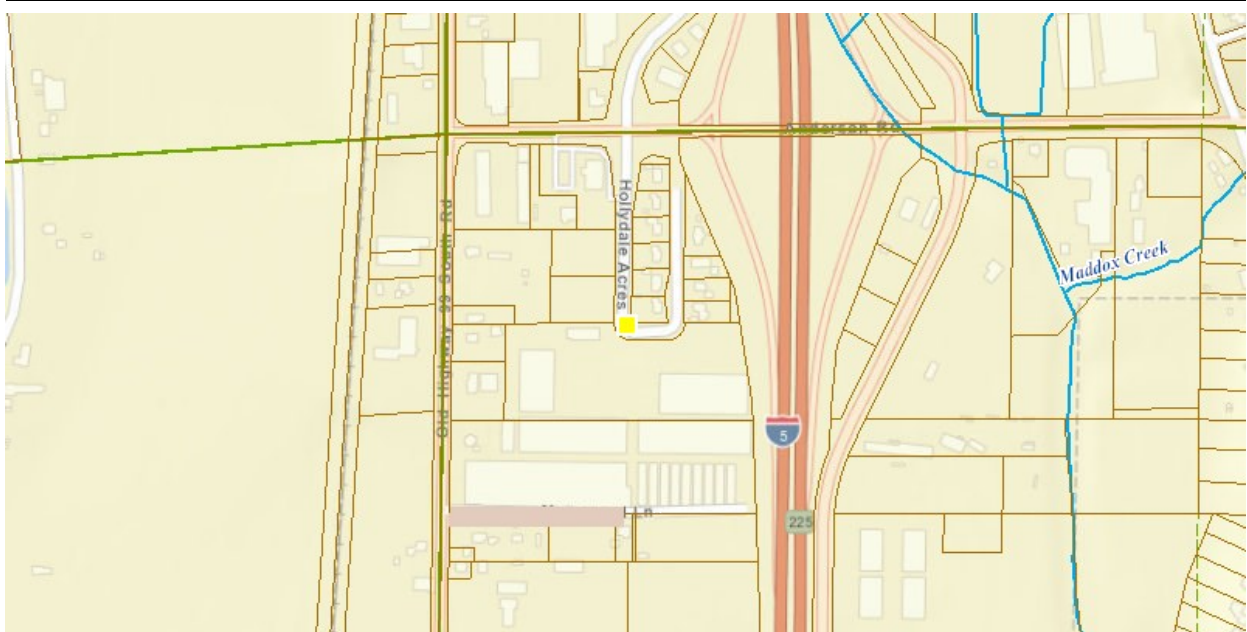
At 9:05 AM the Engineering Department got a report from our WWTP staff (Rick Van Pelt) about silty water being pumped into the drainage system and ending up at the plant. Just after the call Daniel Schmidt, Nick McCausland, and I spoke with Eddie of the PUD this morning at the site located at Milwaukee and 2nd street. There was a filter sock in the catch basin but it was not filtering all of the silt out and some was being released into the catch basin. Eddie said that they were done pumping and would not pump again. I suggested several BMPs they could use in the future that would prevent them from pumping silt into the drainage system. I asked PUD to make sure the street got cleaned up as soon as possible. Nick said that messages were left by DS staff with PUD managers about this concern.

As a side note when I spoke with the PUD staff on site about silty water pumping I was told by the gentleman on the site that PUD will quit replacing old drainage systems in Mount Vernon because the City of Mount Vernon is too difficult to work with. I made sure he was aware that all cities are required to meet the same Department of Ecology standards. He still insisted that the City of Mount Vernon is the most difficult to work with and that PUD will just leave the old deteriorating pipe and go fix issues in other cities. I did not respond again after that. I told Mr. Pete VanAssche about that conversation and he thought that the PUD worker must have been joking.

Work Item Report

Illicit Discharge | IDDE - Discharge | 5937898

Hollydale Acres Ln, Mount Vernon, Washington 98273



Collected By Michele.Myers

Collected Date 8/8/2017 1:19:48 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/21/2018 3:11:29 PM

Status Complete

Priority 1

Asset Id _____

Layer Name _____

Description Caller states that there is oil from the beginning to the end of the street and puddles in all locations where the garbage truck was. This happened yesterday but there is alot of oil all over the street.

Comments Per Andy Hanson there was a Waste Management truck that had a hydraulic spill yesterday in that neighborhood.

Street staff cleaned up the street. JB 0555.

The spill was contained and did not enter into the MS4. - DS

Illicit Discharge | IDDE - Discharge | 5937898

Hollydale Acres Ln, Mount Vernon, Washington 98273

From: mobile311@dudesolutions.com<mailto:mobile311@dudesolutions.com>
To: Brickley, Jason; Chesterfield, Blaine; Schmidt, Daniel

Sent: Tuesday, August 08, 2017 10:20 AM
Subject: New Assignment: IDDE - Discharge

Id: 5937898

Type: IDDE - Discharge

Priority: 1

Status: New Request

Description: Caller states that there is oil from the beginning to the end of the street and puddles in all locations where the garbage truck was. This happened yesterday but there is alot of oil all over the street.

Address: Hollydale Acres Ln, Mount Vernon, WA 98273

Latitude: 48.397562690062200 / Longitude: -122.332985845031000

Date Collected: 8/8/2017 10:19:48 AM

Collected By: Michele.Myers

Posted Date: 8/8/2017 10:19:48 AM

From: "Chesterfield, Blaine" **Date:** 8/8/17 10:23 AM (GMT-08:00)
To: "Hanson, Andy", **Cc:** "Brickley, Jason", "Schmidt, Daniel", "Myers, Michele" **Subject:** FW: New Assignment: IDDE - Discharge Andy,

Do you know if this was one of our trucks or a WM truck?

Jason,

If you think it will help can we get some dry sweep on this and have the sweeper clean it up?

From: Hanson, Andy **Sent:** Tuesday, August 08, 2017 8:34 PM
To: Chesterfield, Blaine, **Cc:** Brickley, Jason; Schmidt, Daniel; Myers, Michele **Subject:** RE: New Assignment: IDDE - Discharge

There was a waste management truck that had a hydraulic spill yesterday in that neighborhood.

I received an email from them that it was taken care of. If not please call the office extension 2602 & David will help you.

From: Brickley, Jason **Sent:** Wednesday, August 09, 2017 5:55 AM
To: Hanson, Andy; Chesterfield, Blaine, **Cc:** Schmidt, Daniel; Myers, Michele **Subject:** RE: New Assignment: IDDE - Discharge

We took care of it.

From: Chesterfield, Blaine **Sent:** Wednesday, August 09, 2017 9:44 AM
To: Pritchard, Sherri, **Cc:** Myers, Michele; Schmidt, Daniel **Subject:** FW: New Assignment: IDDE - Discharge

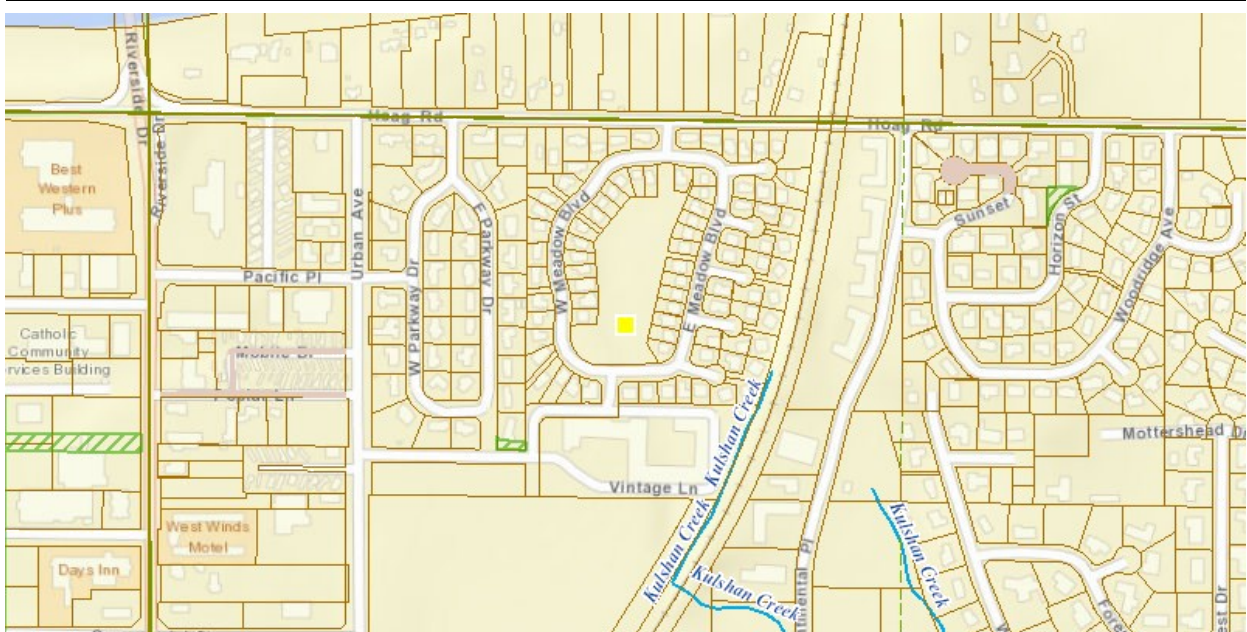
Sherri, Please update and close out this IDDE.

From: Myers, Michele **Sent:** Wednesday, August 09, 2017 10:24 AM
To: Chesterfield, Blaine; Pritchard, Sherri, Cc: Schmidt, Daniel **Subject:** RE: New Assignment: IDDE - Discharge

I did this this morning.

Work Item Report

Illicit Discharge | IDDE - Dumping | 5995556
2230 W Meadow Blvd, Mount Vernon, Washington 98273



Collected By daniels@mountvernonwa.gov

Collected Date 8/17/2017 7:55:49 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/21/2018 3:03:06 PM

Status Complete

Priority 5

Asset Id _____

Layer Name _____

Description Anonymous caller stated that trash has built up around the grate of the pond, also concerned about pet waste around the pond and about gate not being locked.

Comments - DS 8/17/17. The Meadows detention ponds are under private ownership and maintenance. Will contact HOA and go from there.

A subsequent visit to the site revealed that the trash had been cleaned up. - DS

Work Item Report

Illicit Discharge | IDDE - Non S/W Discharge | 6066496

500 N Baker St, Mount Vernon, Washington 98273



Collected By daniels@mountvernonwa.gov

Collected Date 8/30/2017 7:57:30 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/21/2018 5:31:47 PM

Status Complete

Priority 5

Asset Id _____

Layer Name _____

Description Non-NPDES violation. Citizen noticed smelly, brown stuff within sand at Young's Bar on Skagit River.

Comments Along one of the main sandbars of the Skagit River, a citizen reported some smelly, brown stuff in the sand, that has reportedly been going on for a long time. It was noted as having been under ~5' of water when river is high. ERTS came from DoE to Ken Lee and forwarded to Daniel Schmidt at around 4:00pm. Will investigate first thing in the morning - DS 8/30/2017

From the description, I should've guessed what it was. It's excrement, from humans and other species. It appears that DFW has jurisdiction over the area based on the entry sign. - DS 8/31/2017

Blaine emailed Wendy Cole at Washington Department of Fish and Wildlife on Aug 31st 2017 as it is their site. She replied back saying that the request had been forwarded to their Access Management staff who then took care of it. - DS

ERTS Number 675426

Illicit Discharge | IDDE - Non S/W Discharge | 6066496

500 N Baker St, Mount Vernon, Washington 98273

From: Chesterfield, Blaine

Sent: Thursday, August 31, 2017 6:13 PM

To: Cole, Wendy D (DFW), , **Cc:** Pritchard, Sherri; Maginnis, Christina (ECY); Schmidt, Daniel; Barney, Stephanie (ECY)

Subject: ERTS # 675426 Young's Bar POOP

Hi Wendy,

The ERTS on Young's Bar is at the DFW property and Water Access point.

It appears to be horse POOP.

The City does not own this site and it appears to be owned by the DFW.

Does the DFW have a way to clean up these sites when there is an issue.

If you need more information feel free to contact me.

From: Cole, Wendy D (DFW)

Sent: Friday, September 01, 2017 9:04 AM

To: Chesterfield, Blaine, **Cc:** Pritchard, Sherri; Maginnis, Christina (ECY); Schmidt, Daniel; Barney, Stephanie (ECY)

Subject: RE: ERTS # 675426 Young's Bar POOP

All –

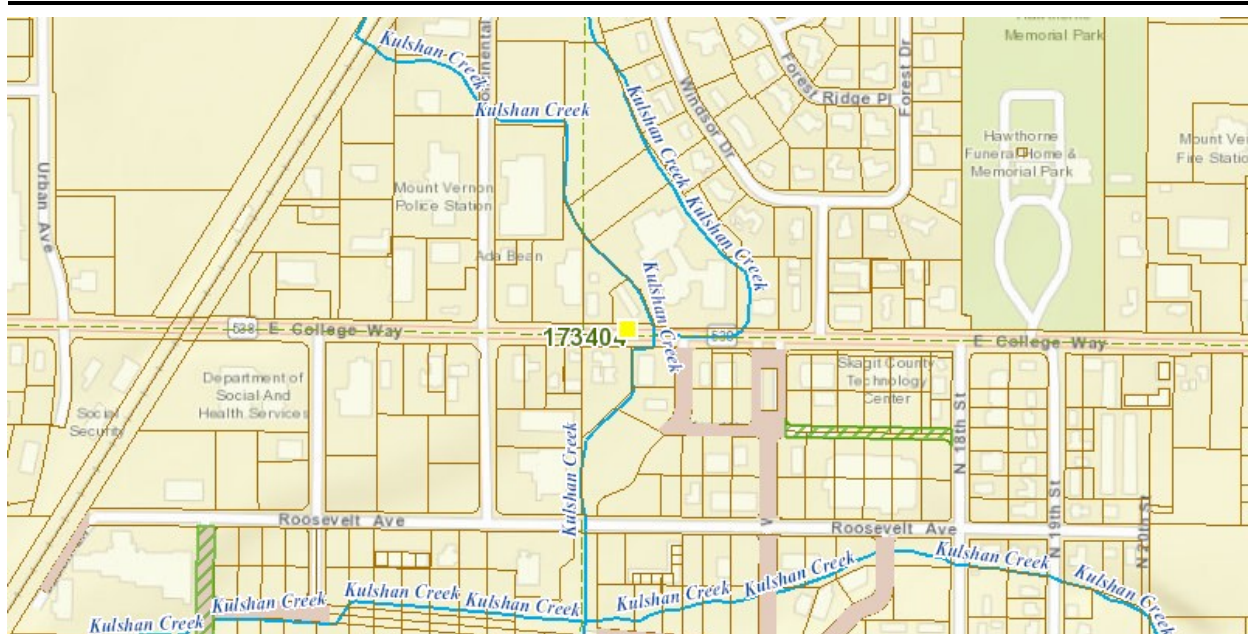
I have forwarded this to our Access Management staff and I'll let you all know when he responds.



Work Item Report

Illicit Discharge | IDDE - Non S/W Discharge | 6142119

1423 E College Way, Mount Vernon, Washington 98273



Collected By Sherri.Pritchard

Collected Date 9/12/2017 7:31:29 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/21/2018 5:24:20 PM

Status Complete

Priority 5

Asset Id _____

Layer Name _____

Description 9/12/2017 Email from Lori Wight (Skagit County) to Daniel/Blaine:
Rick Haley from our office was walking over near the "Splash N'Dash" car wash and noticed a catch basin that may, at super wet/heavy use times, catch car wash overflow. He reported this to me, and I wanted to follow up with his query.
Do you happen to know what their drainage system is out there? And, if there are any catch basins which drain to Kulshan?
Thanks in advance for your help!

Comments 9/12/2017 email from Blaine to Daniel (cc Skagit County):
Lori, I believe that we looked into this a year or two ago when they got a permit for some work.

Daniel, please add this to our reported spill log and investigate.

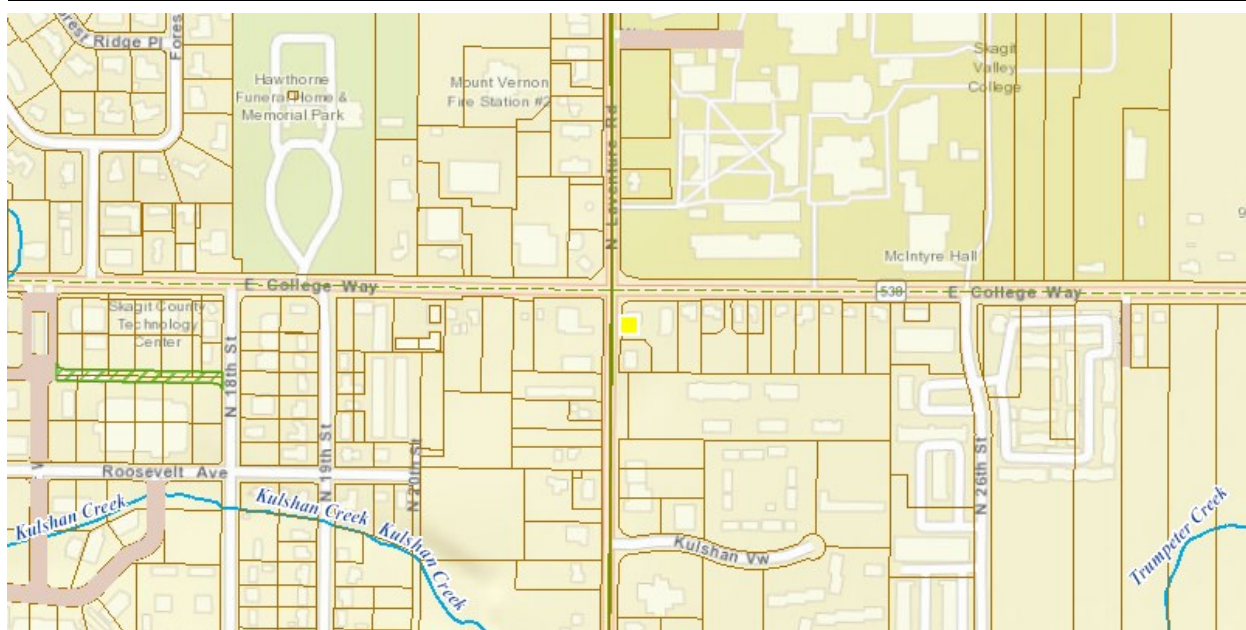
I investigated the area during multiple rain events, and I did not see any evidence of car wash water overflowing into the MS4. - Daniel S

ERTS Number _____

Work Item Report

Illicit Discharge | IDDE - Non S/W Discharge | 6544190

2200 E College Way, Mount Vernon, Washington 98273



Collected By daniels@mountvernonwa.gov

Collected Date 11/17/2017 4:45:54 PM

Modified By daniels@mountvernonwa.gov

Modified Date 3/21/2018 2:33:11 PM

Status Complete

Priority 5

Asset Id _____

Layer Name _____

Description Jason Quigley from Skagit County PW noticed some suds around a CB after a guy poured mop bucket water into it.

Comments I received an email from Jason this morning showing suds around a CB in the Chevron gas station area at the corner of Laventure and College Wy. I looked up our GIS data to find out if the CB was part of our MS4 or privately owned. It did not show up under in our GIS, but I did find the construction plans that show the CB leading away from our system to a privately owned O/W separator. It does not appear to have gotten into our system. Jeanne from Skagit Public Health and I investigated the complaint on site. We talked with Rebecca who manages the Chevron station, and she told us that a new employee, Steven, had likely poured the windshield washing soap into the CB. She assured us that he will be instructed to pour it into the appropriate designated area, and she claims that the soap is biodegradable.

Once on site, Jeanne and I noticed an oily sheen in the water flowing to a couple of CBs that are part of our MS4. The main culprit appeared to be a Pepsi delivery truck, but it was likely coming from many of the cars parked in the parking lot. Jeanne wondered if an O/W separator could be installed before the parking lot runoff reached our MS4 and/or the county could issue an ordinance to get the worst polluting vehicles off the road. Back in the office, I noticed that the drainage system does include a city owned and operated O/W separator before the surface water outfalls into Kulshan Creek. Will discuss with Blaine. - DS 11/17/2017

Collection crew cleaned road side drainage system, and no other issue was found downstream. It was determined that the spill did not have an impact on the MS4. - DS

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From: [Jason Quigley](#)
To: [Schmidt, Daniel](#)
Cc: [Chesterfield, Blaine](#); [Lori Wright](#)
Subject: suds in the storm drain
Date: Friday, November 17, 2017 7:40:58 AM

Daniel,

I wanted to let you know of this incident I witnessed yesterday at McDonalds/Chevron at 2200 E College Way, Mt Vernon, WA. I didn't clearly see the uniform the worker was wearing but as I was pulling out, a young man came out and dumped mop bucket water into the catch basin (Fig. 1).



Fig. 1. Photo taken at 2200 E College Way, Mt Vernon, WA 98273, 11/16/17 at 1:25PM.

In seeing this incident take place I realized that I am not completely clear on the rules if this catch basin goes to an oil/water separator or whatever and doesn't enter into the MS4, but I am presuming the same rules apply and intentional pouring of anything into the drain is a no no. Below is an aerial showing the location of the cb (Fig. 2).



Fig. 2. Callout box showing location of catch basin.

Thank you,
Jason

Jason Quigley
Environmental Resources Technician II
Skagit County Public Works
360-416-1463 (desk)
360-630-0339 (cell)